Kirklees Waste Needs Assessment 2025

Review of Strategically Significant Waste Movements from Kirklees 2021-2023 & Duty to Cooperate Action

Report: Final Issue

Version: v2.3

Issued: October 2025

BPP Consulting Document Control

Project: Kirklees Waste Needs Assessment 2025

Report: Review of Strategically Significant Waste Movements from Kirklees & Duty to Cooperate Action

Version Description: Final Issue

Version No: v2.3

Date: 14.10.2025

Version No.	Version Description	Author	Date	Reviewed	Date
1.0	Draft for Client review	Alan Potter (Partner)	06.12.2024	*Nick Reeves (Client Reviewer)*	19.12.2024
2.0	Post Client Review	Ella Mills (Data Analyst)	03.03.2025	Alan Potter (Partner)	10.03.2025
2.1	Final Issue for sign off	Alan Potter (Partner)	07.07.2025	*Nick Reeves (Client Reviewer)*	03.09.2025
2.2	Final Issue	Ella Mills (Data Analyst)	09.09.2025	Alan Potter (Partner)	21.09.2025
2.3	Final Issue	Ella Mills (Data Analyst)	14.10.2025	Alan Potter (Partner)	14.10.2025

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Abbreviations

Abbreviation	Full Term
EA	Environment Agency
EfW	Energy from Waste
ELV	End-of-Life Vehicle
MRS	Metal Recycling Site
MRF	Material Recycling Facility
nPPG	national Planning Practice Guidance
NPPW	National Planning Policy for Waste
RDF	Refuse Derived Fuel
WDI	Waste Data Interrogator
WNA	Waste Needs Assessment
WPA	Waste Planning Authority
WTS	Waste Transfer Station

Glossary of Terms

Term	Definition
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.
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.
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.
Hazardous Waste	Waste requiring special management under the Hazardous Waste Regulations 2005 due to posing potential risk to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste.
Incineration	The controlled combustion of waste. Energy may also be recovered in the form of heat (see Energy from Waste).
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).
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials from the incoming waste stream.
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.
Recovery	Subjecting waste to processes that recover value including recycling, composting or thermal treatment to recover energy.

Term	Definition
Recycling	The reprocessing of materials extracted from the waste stream either into the same product or a different one.
Refuse Derived Fuel	A fuel produced from combustible components extracted from municipal solid waste that can be used as a substitute for fossil fuels in cement, power or steel plants, or as a reduction agent in steel furnaces.
The Plan area	The area subject to the Waste Local Plan to which this study relates. In this case the Kirklees area.
Waste Planning Authority	The authority responsible for planning for waste within a specific administrative area. In this case Kirklees.
Waste Transfer Station	A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.

1. Introduction

1.1 This report presents the outcome of an assessment of movements of waste (a.k.a. waste flows) between the administrative area of Kirklees and other Waste Planning Authority (WPA) areas in England, to determine which movements may be regarded as strategic (or strategic in the future). Identifying movements that may be strategic is a necessary step in determining whether any spatial strategy underpinning a waste local plan can rely on such movements over the Plan period. If not, then specific provision for additional capacity to be developed within the Plan area to address potential shortfalls may be required. Where strategic movements are identified, the relevant WPAs would be contacted to establish whether movements into the receiving facilities within their area can be relied upon.

1.2 Engagement with WPAs normally involves consideration of the following:

1. Whether historical flows of waste identified as potentially strategic are likely to continue;
2. Barriers to the continuation of waste exports due to, for example, exhaustion of finite capacity and cessation due to time limited availability at receiving facilities;
3. Whether new flows of waste from the Plan area are likely to take place. This takes the above factors into account as well as any changes in capacity that the management of waste arising in Kirklees currently relies on (situated either within or beyond Kirklees) and changes in contractual arrangements.

1.3 Advice is provided to support Kirklees Council in its ongoing Duty to Cooperate (DtC) engagement activities by recommending which WPAs be contacted about which waste movements.

2. Waste as a Strategic Issue

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

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

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

The Duty to Cooperate

2.2 Section 33A of the *Planning and Compulsory Purchase Act 2004* (as amended by section 110 of the Localism Act 2011) requires Councils in England that produce development plan documents to cooperate with relevant local planning authorities, county councils and bodies or other persons as prescribed. The Duty to Cooperate (aka 'the Duty') imposes, in particular, a duty to: *"engage constructively, actively and on an ongoing basis*". This is required in relation to *"maximising the effectiveness*" of, and having "*regard to",* activities concerned with supporting or preparing planning policies "*so far as relating to a strategic matter".* Hence there is a legal duty on plan making Councils to engage "*constructively, actively and on an on-going basis"* in "*maximising the effectiveness*" of Local Plans.

2.3 As noted above, the Duty applies to the preparation of development plan documents, insofar as they relate to a "*strategic matter*". A strategic matter is defined as *"sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic*..." (S33A(4)). Therefore, waste management between Plan areas may qualify as a strategic matter for the purposes of the Duty.

[1] Paragraph 4.

2.4 The updated National Planning Policy Framework (December 2024) expects that Local Plans include 'non-strategic' and 'strategic' policies, and explains that strategic policies should:

"... set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for…infrastructure" including "*for⋯..waste management*"[2].

It goes on to specify that:

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

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

Net Self Sufficiency

2.6 Self-sufficiency in terms of waste, as outlined in Article 16 of the EU Waste Framework Directive[4], refers to the principle that each Member State of the European Union should aim to manage and dispose of its own waste within its borders, to the extent possible. This encourages Member States to take responsibility for their own waste and is designed to reduce the need for cross boundary waste movements, which can create inequalities between countries and waste tourism. Even though the UK has now exited the EU, the principle still applies at national level to the UK as a whole[5].

2.7 The principle of self-sufficiency has been adapted for local waste planning purposes to establish how much management capacity should be provided in each waste Plan area. The addition of the term 'net' recognises that movements of waste occur between waste Plan area, as the management of waste arising within a specific Plan area is not

[2] Paragraph 20.

[3] Paragraph 28.

[4] EUR-Lex

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

generally restricted to administrative boundaries. Movements can be beneficial for optimising the waste management system where economies of scale apply. This means there is no expectation that each tonne of waste produced in a particular Plan area is to be managed within that Plan area. Rather that, overall, there should be a balance of provision. The objective of net self-sufficiency ensures that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a particular Plan area. The degree to which a Plan area is net self-sufficient can be established by comparing the available capacity within the Plan area against the projected capacity requirements.

2.8 In addition to the above, the management of any waste by disposal, or the recovery of mixed municipal waste is also subject to the proximity principle[6] which seeks to ensure waste is managed at one of the nearest appropriate facilities. National guidance acknowledges that such a facility may be located outside a Plan area.

[6] See Paragraph 4 of National Planning Policy for Waste.

Identifying Waste Flows that might be Strategic

2.9 A key matter is to establish whether key historical patterns of waste management outside a Plan area can be relied upon for the duration of the Plan period. To ensure compliance with the DtC, the focus for engagement in this case is to address outgoing waste flows, that may be regarded as 'strategic' in nature. The guideline thresholds set out in the National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England' as follows:

- Non-hazardous waste: 5,000 tonnes per annum
- Inert waste: 10,000 tonnes per annum
- Hazardous waste: 100 tonnes per annum

were used to identify the flows of waste from Kirklees to other Plan areas that might be considered strategic in nature.

2.10 Only flows to facilities located in England and Wales (Appendix 1) have been considered. Hence possible flows to sites located in Scotland[7] and elsewhere in Europe are not accounted for.

Export and Imports of Waste to and from Kirklees

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

[7] The Scottish Environment Protection Agency (SEPA) does not report inputs to sites in Scotland by receiving WPA for waste imported from England.

Table 1: Tonnages of Kirklees waste managed in permitted facilities within Kirklees and outside Kirklees, and tonnage of waste imported to Kirklees facilities for management (tonnes)

Source: WDI 2023

Total waste arising in Kirklees Council	Kirklees waste managed outside Kirklees Council	Kirklees waste managed in Kirklees	Waste imported to Kirklees	Total Managed in Kirklees
710,810	277,107	433,703	463,302[8]	897,005

2.12 Table 1 shows that c711,000 tonnes of waste produced in Kirklees in 2023 was managed through permitted sites in England of which c433,500 tonnes was managed in Kirklees. This compares with c277,000 tonnes managed beyond Kirklees. This export is offset by the import of waste from outside Kirklees for management of c463,500 tonnes. Taking this snapshot as a simple balance, Kirklees achieved net-self-sufficiency in waste management in 2023.

Kirklees to Non-inert Landfill

2.13 Given the small amount of non-hazardous waste from Kirklees reported as being managed at non-inert landfill (c4,000 tonnes), this was investigated further as follows:

- The principal receiving landfills for non-hazardous waste from Kirklees was Welbeck landfill site located in Wakefield and Whinney Hill (Phase 2) Landfill located in Lancashire. A check was undertaken to see if any waste not coded below Yorkshire and Humber region was reported as being received at either of these sites that might have actually arisen in Kirklees. This found that, while all inputs to Whinney Hill Landfill were coded down to WPA level, c1,500 tonnes of waste not coded below Yorkshire and Humber was accepted at Welbeck landfill in 2023, which might have arisen in Kirklees.
- A check was undertaken of the reported fate of outputs from Kirklees permitted waste management sites in the WDI waste removed dataset. This showed that c28,000 tonnes of non-inert waste had a reported final fate of landfill, none of which identified Wakefield as a destination WPA. However, c9,500 tonnes were sent to an unidentified landfill in Yorkshire and Humber and given Wakefield is

[8] Excluding c744,000 tonnes of sludges managed at the Huddersfield Energy and Recycling Facility.

located in the region, it was taken that the c1,500 tonnes of uncodeable waste reported as received at Welbeck landfill, did arise in Kirklees. This left c8,000 tonnes (9,500t minus 1,500t) of non-inert waste going to other landfills in Yorkshire and Humber which may also have arisen in Kirklees.

- The Environment Agency remaining landfill void 2023 dataset was checked to identify non-hazardous landfills within the Yorkshire and Humber region that may have received non-inert waste from Kirklees in 2023. The landfills are mapped in Figure 1 below.



Figure 1: Merchant non-hazardous landfills with remaining void in 2023 in Yorks & Humber

- Figure 1 shows that the next closest landfill to Kirklees is Hazel Lane Quarry operated by Catplant Quarry Ltd in Doncaster. A check of the WDI 2023 shows c12,000 tonnes of waste not coded below Yorkshire and Humber was received at the site. This was taken to provide a match for the remaining c8,000 tonnes of non-inert waste leaving Kirklees permitted sites reported as having been managed via landfills located somewhere in Yorkshire and Humber region. That is:
  i. 1,500t going to Welbeck as Y&H waste
  ii. 8,000t going to Hazel Lane Quarry as Y&H waste.

- Having accounted for the 9,500 tonnes of non-inert waste leaving Kirklees permitted sites destined for a landfill somewhere in the Yorkshire & Humber region, a search was also conducted for the remaining c18,500 tonnes (c28,000t minus c9,500t). The majority of this was reported as leaving the following Kirklees permitted sites:
    - Thornhill Integrated Waste Management Facility,
    - Kirklees EfW plant, and
    - J T Shingleton & Son Facility.
- For the first two sites, the waste was identified as going to a landfill in Lancashire (c13,000t and c1,500t respectively). A match was not found as no non-hazardous waste landfill sites located in Lancashire reported receiving non-hazardous waste from Kirklees and only 178 tonnes of Yorkshire and Humber uncodeable waste was reported as going to non-hazardous waste landfill in Lancashire. The fate of outputs from J T Shingleton site were predominantly reported as going to landfill in Kirklees, which has been assumed to be in error given there were no non-hazardous landfills operating in Kirklees in 2023.
- Four other sites in Kirklees reported <500 tonnes of non-hazardous waste leaving the site destined for landfill so have not been interrogated further.

2.14 While it was not possible to gain a match for the remaining c18,500 tonnes, given the Kirklees permitted sites reported c28,000 tonnes of non-inert waste going to landfill, and given the absence of non-inert landfill capacity in Kirklees itself, it has been assumed that this total tonnage will have been exported from Kirklees for management. Therefore, Figure 2 below shows this tonnage as an outward flow on a precautionary basis. The c9,500 tonnes attributed to Welbeck landfill in Wakefield (c1,500 tonnes) and Hazel Lane Quarry in Doncaster (c8,000 tonnes) has been included in Tables 2 and 3. As it has not been possible to attribute the remaining c18,500 tonnes to a specific receiving landfill site, this tonnage has not been factored into the identification of recipient WPAs to be contacted under DtC in the exercise that follows.

2.15 Figure 2[9] displays visually the balance between imports and exports by waste:

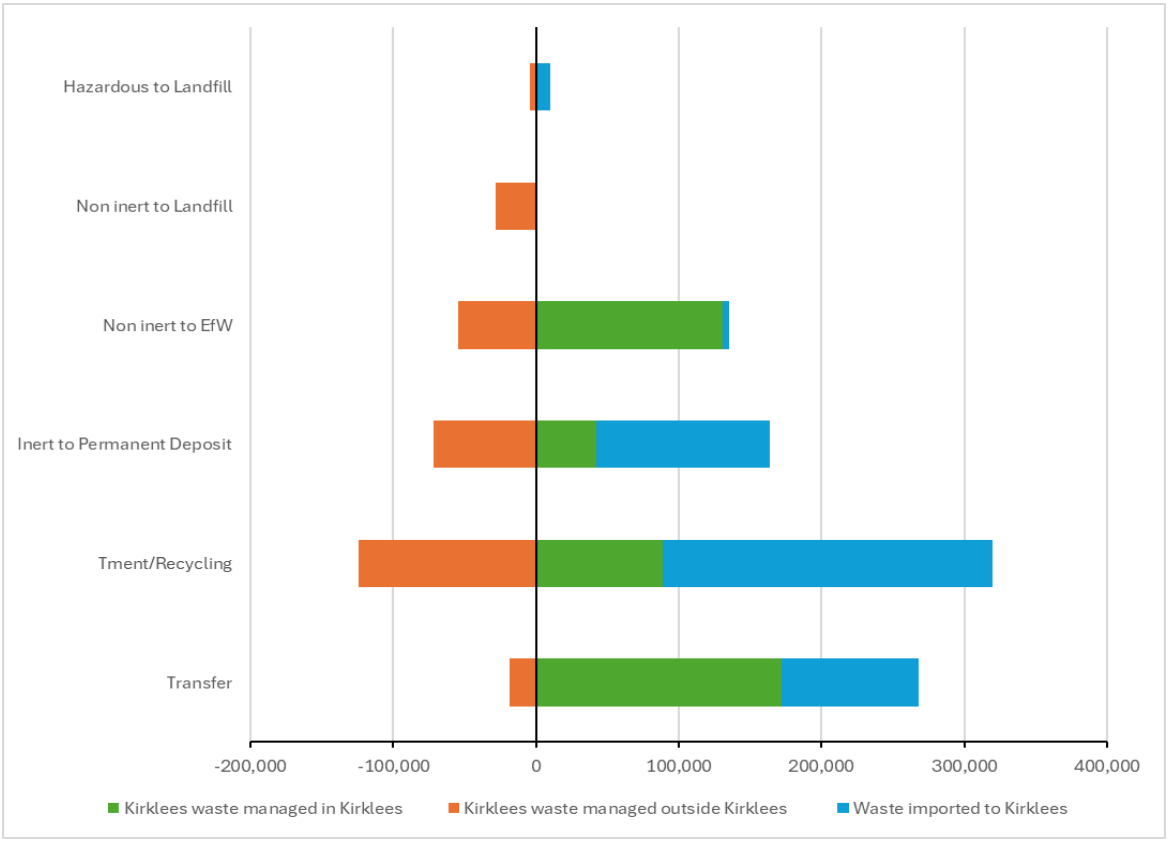


Figure 2: Waste import and export balance in Kirklees 2023 by management method and waste type where known (tonnes)

2.16 Figure 2 shows that:

- Kirklees main export is to treatment/recycling sites.
- More waste was imported to Kirklees permitted waste management facilities than was exported for management through hazardous landfill, inert to permanent deposit and treatment/recycling.

2.17 It should be noted that Figure 2 presents:

1. a snapshot of waste flows for a single year only (flows can switch from year to year so this snapshot may not be representative); and
2. may not necessarily be a true representation of net -self-sufficiency as actual inputs to Kirklees facilities in 2023 may not be reflective of potential capacity of

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

sites operating in Kirklees (in most cases inputs in any particular year will be lower than actual site capacity).

3. Waste Flows from Kirklees

Applying the agreed strategic waste flow thresholds

3.1 The waste movement guidelines set out in para 2.12 above, have been applied as thresholds by waste category to screen out movements from Kirklees that would not be considered strategic. Table 2 shows movements of waste from Kirklees in 2023 to WPA areas outside Kirklees (in rank order) where one or more of the thresholds have been met or exceeded in 2023, by basic waste category reported through WDI.

Table 2: Destination WPAs of Inert, Non-inert and Hazardous Waste exports from Kirklees in rank order applying DtC screening thresholds 2023[10]

Source: WDI 2023

N.B. Entries amber highlighted are those where thresholds have been met or exceeded.

Receiving WPA	Non-inert	Inert	Hazardous
Wakefield	53,162[11]	20,179	3,923
Calderdale	<5,000	64,558	<100
Stockton-on-Tees	25,655	0	595
Leeds City	23,213	<10,000	1,980
Doncaster	8,175[12]	<10,000	595
Sunderland	0	0	6,134
North Yorkshire	5,973	<10,000	<100
Kingston Upon Hull City	5,602	0	<100
Derbyshire	<5,000	<10,000	4,974
Liverpool	<5,000	0	2,852
Cheshire West & Chester	<5,000	0	2,180
Solihull	0	0	1,978
Lancashire	<5,000	<10,000	1,079
Sheffield	<5,000	<10,000	951
Sandwell	<5,000	0	935
North-East Lincolnshire	0	0	881
City of York	<5,000	0	869
Bury	<5,000	0	686
Salford	<5,000	<10,000	551

[10] Note that site categories 'processing' and 'storage' have been deselected as storage sites are generally intermediate, so are excluded to avoid double counting; and processing is generally reprocessing capacity e.g. paper mills and glass furnaces which are outside the scope as waste uses/ facilities.

[11] Includes c1,500 tonnes attributed to Kirklees as per discussion in paragraph 2.15.

[12] c8,000 tonnes attributed to Kirklees as per discussion in paragraph 2.15.

Receiving WPA	Non-inert	Inert	Hazardous
Staffordshire	<5,000	0	253
Rotherham	<5,000	<10,000	228
Trafford	<5,000	0	223
Tameside	<5,000	0	217
Nottinghamshire	<5,000	<10,000	216
Kent	<5,000	0	130
Norfolk	0	<10,000	100

3.2 Table 2 shows that in 2023 waste management facilities located in a total of 26 WPA areas accepted waste in excess of the screening thresholds and 4 WPAs accepted waste in two or more of the waste categories in quantities that met or exceeded the thresholds. Only 7 WPAs received inert or non-inert waste in tonnages exceeding the guideline thresholds, with hazardous waste exports accounting for the remaining dependencies.

3.3 Detailed examination of the totals indicates that movements of waste from Kirklees that might be classed as strategically significant i.e. met or exceeded the screening DtC thresholds went to the sites shown in the following tables. It is considered that where strategic flows went to a small number of sites the strategic reliance is greater than if it was distributed across a large number of sites. This therefore suggests that flows to such sites are of greater strategic importance to the Plan strategy. Conversely where inputs to individual sites fell below the threshold they have been excluded from further analysis even if the total tonnage going to the host WPA exceeded the threshold.

Kirklees Non-Inert Waste Destinations

3.4 Table 3 shows the destination sites which received more than 5,000 tonnes of Kirklees non-inert waste in 2023.

Table 3: Destination sites for Kirklees Non-Inert Waste exports 5,000t or more in rank order

Source: WDI 2023

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 5,000t or more	Total
Wakefield	Incineration	Ferrybridge	Enfinium Ferrybridge 2 Ltd	Refuse Derived Fuel (RDF)	26,900
Wakefield	Incineration	Ferrybridge	Enfinium Ferrybridge 1 Ltd	Refuse Derived Fuel (RDF)	22,453
Stockton-on-Tees	Treatment	Cleveland IBA	Blue Phoenix Ltd	Bottom ash and slag	25,644
Leeds City	MRS	Pepper Road	Sims Group UK Ltd	Multiple wastes sub 5,000 tonnes	7,935
Leeds City	Treatment	Unit 41, Knowsthorpe Way	Timberpak Ltd	Multiple wastes sub 5,000 tonnes	6,570
Doncaster [13]	Landfill	Hazel Lane Quarry	Catplant Quarry Ltd	Process residues	8,175

3.5 Table 3 shows the significant flows of non-inert waste from Kirklees in 2023 were managed at 5 facilities located in only 4 WPA areas. This indicates a significant dependency with the WPAs of Wakefield, Stockton on Tees, Leeds City and Doncaster. Notably Wakefield and Leeds City form part of the West Yorkshire sub region of which Kirklees also forms part.

Kirklees Inert Waste Destinations

3.6 Table 4 shows the destination sites which received more than 10,000 tonnes of inert waste from Kirklees in 2023.

Table 4: Destination sites for Kirklees Inert Waste exports 10,000t or more in rank order

Source: WDI 2023

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 10,000t or more	Total
Calderdale	Landfill	Clockface Quarry Inert Site	P. Casey Enviro (Clockface) Ltd	Soils and stones	53,925
Wakefield	Landfill	Welbeck Landfill Site	Welbeck Waste Management Ltd	Soils and stones	11,415

[13] As discussed in paragraph 2.15.

3.7 Table 4 shows the significant flows of inert waste from Kirklees in 2023 were managed at 2 facilities located in 2 different WPA areas that form part of the West Yorkshire sub-region.

Kirklees Hazardous Waste Destinations

3.8 Table 5 shows the destination sites which received more than 100 tonnes of hazardous waste from Kirklees in 2023.

Table 5: Destination sites for Kirklees Hazardous Waste exports 100t or more in rank order

Source: WDI 2023

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type (100t or more)	Total
Sunderland	Treatment	Hendon Dock Process Plant	Tradebe Solvent Recycling Ltd	Hazardous Liquid Waste	6,134
Derbyshire	Treatment	Ilkeston Waste Treatment and Transfer Facility	Castle Waste Services Ltd	Gas Treatment Solid Wastes	4,531
Derbyshire	Treatment	Norwood Recycling Centre	Veolia ES (UK) Ltd	Multiple Wastes Sub 100 Tonnes	443
Wakefield	Landfill	Welbeck Landfill Site	Welbeck Waste Management Ltd	Hazardous Soils & Stones	3,753
Wakefield	MRS	CJ Metals Recycling Ltd	CJ Metals Recycling Ltd	ELVs	170
Liverpool	Treatment	Garston Distillation Services	Veolia ES (UK) Ltd	Hazardous Liquid Waste	2,839
Cheshire West & Chester	Incineration	Ellesmere Port Incinerator	Veolia ES (UK) Ltd	Hazardous Liquid Waste	1,924
Cheshire West & Chester	Transfer	Cheshire Waste Management Centre	Tradebe Northwest Ltd	Hazardous Liquid Waste	256
Solihull	Treatment	Cornets End Recycling Facility	NRS Meriden Aggregates Ltd	Hazardous Soils & Stones	1,978
Leeds City	Treatment	Carr Crofts Waste Treatment Facility	Oates Environmental Ltd	Machining Emulsions & Solutions	947
Leeds City	Treatment	Knostrop Waste Treatment Facility	FCC Recycling (UK) Ltd	Hazardous Liquid Waste	761
Leeds City	MRS	Pepper Road	Sims Group UK Ltd	Lead Acid Batteries	175
Sheffield	Transfer	Parkwood Springs, Douglas Rd	Frogson Waste Management Ltd	ELV Depollution Waste	544
Sheffield	Treatment	Ecclesfield Industrial Waste Treatment Facility	FCC Recycling (UK) Ltd	Interceptor Sludges	398
Lancashire	Treatment	Unit 21-22 Roman Way	3r Technology UK Ltd	Premixed Wastes	937
North East Lincolnshire	Treatment	Immingham Materials Recycling Facility	Enva Battery Recycling Ltd	Lead Acid Batteries	881

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type (100t or more)	Total
City of York	Treatment	Harewood Whin Liquid Waste Treatment Plant	Acumen Waste Services Ltd	Oily Water from Oil/Water Separators	869
Sandwell	Treatment	ERQ - STC, E	Waste Recycling Group (Central) Ltd	Hazardous Soils & Stones	837
Bury	Landfill	Pilsworth South Landfill	Viridor Waste Management Ltd	Asbestos CDE	686
Doncaster	Treatment	Asphalt Waste Recycling Facility	Tarmac Trading Ltd	Bituminous Mixtures Containing Coal Tar	595
Stockton-on-Tees	Treatment	Port Clarence Landfill Site	Augean Treatment Ltd	Hazardous Soils & Stones	485
Salford	Treatment	CSG Lanstar (Cadishead)	Cleansing Service Group Ltd	Wastes Containing Dangerous Substances	484
Staffordshire	Treatment	Stoke Waste Treatment & Transfer Facility	Castle Oils Ltd	Gas Treatment Solid Wastes	238
Trafford	Transfer	Trafford Park Waste Oil	Slicker Recycling Ltd	ELV Depollution Waste	208
Nottinghamshire	Treatment	Bilsthorpe Oil Treatment Plant	Enva England Specialist Waste Ltd	ELV Depollution Waste	192
Rotherham	Transfer	The New Depot	Woodland Oil Ltd	Multiple Wastes Sub 100 Tonnes	155
Tameside	Treatment	Sims Group UK, Stalybridge	Sims Group UK Ltd	Multiple Wastes Sub 100 Tonnes	144
Kent	Treatment	Aylesford Metals Recycling Facility	London Mining Associates Ltd	Premixed wastes	130
Norfolk	Treatment	Thetford WEEE Treatment Facility	Wiser Recycling Ltd	Multiple Wastes Sub 100 Tonnes	100

3.9 Table 5 shows the significant flows of hazardous waste from Kirklees in 2023 were managed at 29 different facilities located in 23 WPA areas, including 2 WPAs that form part of the West Yorkshire subregion.

4. Summary

4.1 A total of 34 facilities[14] have been identified as receiving what may be regarded as strategically significant quantities of waste from Kirklees in 2023. These were spread across 24 WPA areas as shown in Table 6 and are mapped in Figure 2 below.

Table 6: WPAs with sites that received strategically significant tonnages of Kirklees waste in 2023 by region in rank order

Region	WPA	Non-inert	Inert	Hazardous
Yorks & Humber	Wakefield	49,353	11,415	3,922
Yorks & Humber	Calderdale	<5,000	53,925	<100
Yorks & Humber	Leeds City	14,505	<10,000	1,883
Yorks & Humber	Doncaster	8,175	<10,000	595
Yorks & Humber	Sheffield	<5,000	<10,000	942
Yorks & Humber	North East Lincolnshire	0	0	881
Yorks & Humber	City of York	<5,000	0	869
Yorks & Humber	Rotherham	<5,000	<10,000	155
North East	Stockton-on-Tees	25,644	0	485
North East	Sunderland	0	0	6,134
North West	Liverpool	<5,000	0	2,839
North West	Cheshire West and Chester		0	2,180
North West	Lancashire	<5,000	0	937
North West	Bury	<5,000	0	686
North West	Salford	<5,000	<10,000	484
North West	Trafford	<5,000	0	208
North West	Tameside	<5,000	0	144
East Midlands	Derbyshire	<5,000	<10,000	4,974
East Midlands	Nottinghamshire	<5,000	<10,000	192
West Midlands	Solihull	0	0	1,978
West Midlands	Sandwell	<5,000	0	837
West Midlands	Staffordshire	<5,000	0	238
South East	Kent	0	0	130
East of England	Norfolk	0	<10,000	100

[14] The total of each Table amounts to 36 facilities, but two entries - Welbeck Landfill (Wakefield) & Pepper Rd (Leeds) - appear in two tables.

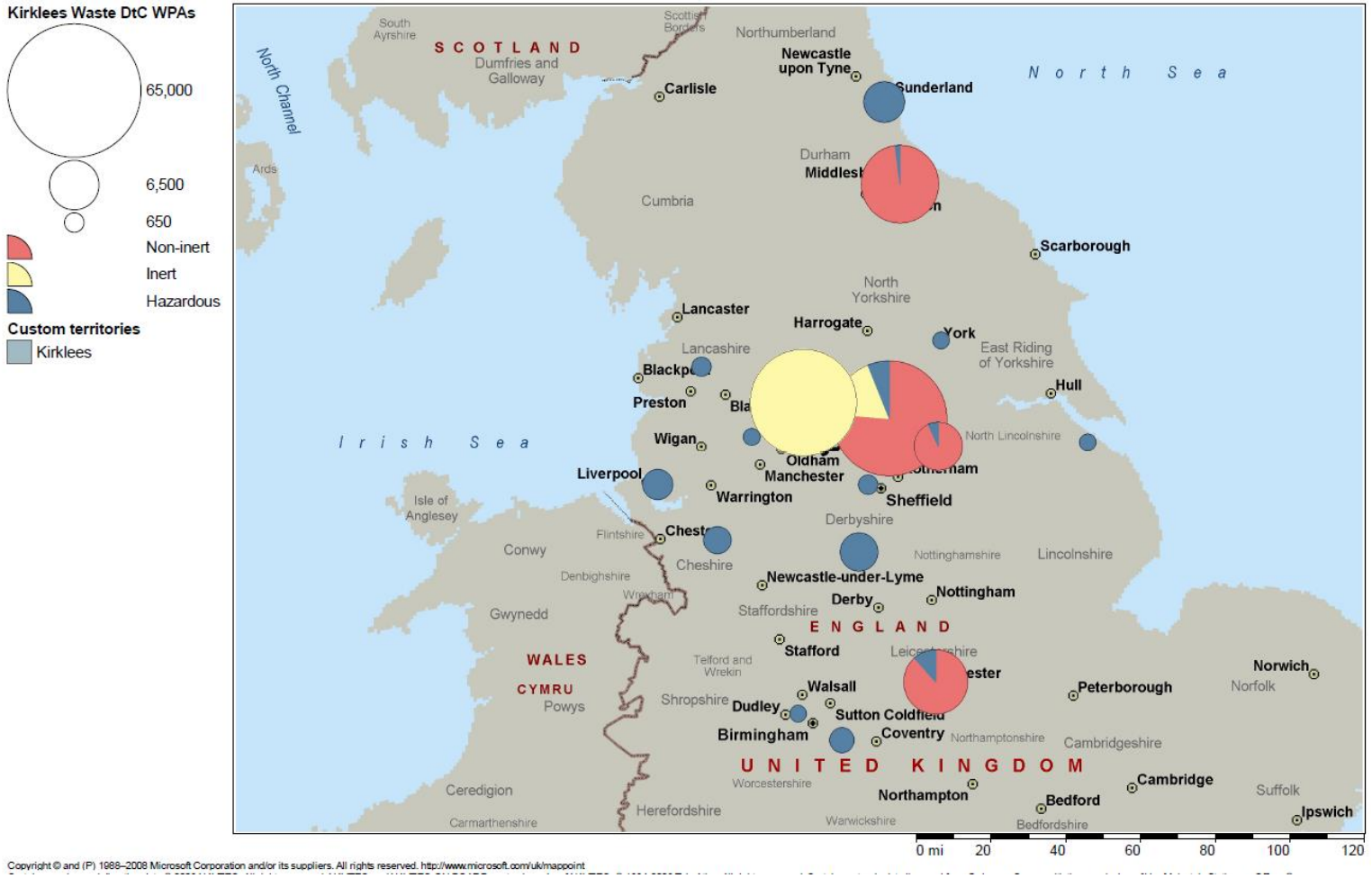


Figure 3: Distribution of Kirklees waste flows in 2023 by Destination WPA and Waste Type (500t or more)

5. Recommendation

5.1 A total of 34 sites have been identified as receiving what may be regarded as strategically significant quantities of waste from Kirklees in 2023. These were spread across 24 WPA areas.

5.2 Analysis of data for 2021 and 2022 indicates a further 10 WPAs received waste in excess of the thresholds in at least one of those years. The receiving WPAs are shown in Appendix 2. The receiving sites are listed by waste type in Appendix 3, 4 and 5 respectively.

5.3 All the host WPAs ought to be contacted to confirm the following:

1. Whether the facilities identified as receiving waste are still operational given the dataset is for 2023. It should be noted that facilities identified as Landfill will have a finite life.
2. Any planning reasons that might mean the acceptance of wastes from Kirklees cannot continue, such as consent conditions and end dates; or if the site has been earmarked in local plans for redevelopment. In addition, where no planning reason is given confirmation that the site is safeguarded for the management of that type of waste should be sought.
3. Whether the host WPA has any specific policies in its local plan concerning providing for the management of waste that arises outside their respective Plan area.
4. Whether any Statements of Common Ground have been entered into, or whether there has been correspondence, with other source WPAs concerning continued availability of capacity at the facility in question, that might compromise continued access for Kirklees' waste.

The outcomes of the above engagement should be documented, and Statements of Common Ground sought with WPAs hosting facilities taking strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate.

6. DtC Progress Review

6.1 Kirklees Council initiated a DtC engagement exercise in summer of 2024 using data from the WDI 2022 and HWI 2022. A total of 30 WPAs were identified as receiving what may be regarded as strategically significant quantities of waste from Kirklees in the WDI 2022.

6.2 In addition, screening of the HWI 2022 identified a further 15 WPAs, receiving what may be regarded as strategically significant quantities of hazardous waste from Kirklees. In addition, a number of WPAs that sent strategically significant tonnages to Kirklees were identified and contacted. Given net self sufficiency is the objective, inward flows to Kirklees are not considered strategically significant to the strategy for the future management of Kirklees waste and hence have not been considered in this report. At the date of writing 25 WPAs had not responded to the enquiry, while 24 had as set out in Table 7 below.

Table 7: Target WPAs & DtC Status in 2024 by Response Status

Target	HWI 22	WDI 2022	WDI 2022	WDI 2022	Target WPA in DTC Report	Response Status
WPA	Haz	Haz	HIC	Inert/C+D		
Birmingham	107				n	No response
Bradford			5,646		y	No response
Calderdale	224		6,932	52,478	y	No response
City of York	1,325	1,315			y	No response
Derbyshire	1,641	1,568			y	No response
East Riding of Yorkshire				13,518	y	No response
Kingston Upon Hull			6,661		y	No response
Leeds	4,046	3,045	21,875	5,585	y	No response
North East Lincolnshire		657			y	No response
Rotherham	270		9,561		y	No response
Sandwell	12,697	12,721			y	No response
Sheffield	942	814	1,183	1,737	y	No response
Stockton-on-Tees	5,585	182	24,158		y	No response
Stoke-on-Trent	692				n	No response[15]
Sunderland	4,816	4,600			y	No response
Walsall	146				y	No response
Wolverhampton	379				n	No response
Bristol	290				n	*No response*

[15] Stoke-on Trent shares a Joint Waste Plan with Staffordshire County Council (that did respond) that makes some allowance for cross boundary waste flows.

Target	HWI 22	WDI 2022	WDI 2022	WDI 2022	Target WPA in DTC Report	Response Status
WPA	Haz	Haz	HIC	Inert/C+D		
Flintshire				1,894	n	*No response*
Gateshead	743	750			y	*No response*
Lincolnshire	679				n	*No response*
Solihull					additional	*No response*
Telford and Wrekin					additional	*No response*
Barnsley			6,697	3,353	y	Response received
Bolton				1,476	n	Response received
Bury	223				y	Response received
Cheshire East	1,784				n	Response received
Cheshire West & Chester	2,377	1,932			y	Response received
Doncaster					y	Response received
Dudley	441				n	Response received
Hampshire	449				y	Response received
Kent	1,635	1,653			y	Response received
Lancashire	2,544	1,281			y	Response received
Liverpool	2,127	1,633			y	Response received
Newport		382			n	Response received
Northamptonshire	171				n	Response received
Norfolk		188			y	Response received
North Tyneside	224				n	Response received
North Yorkshire		222	7,161		y	Response received
Nottingham			1,246		y	Response received

Target	HWI 22	WDI 2022	WDI 2022	WDI 2022	Target WPA in DTC Report	Response Status
WPA	Haz	Haz	HIC	Inert/C+D		
Nottinghamshire	183	133			y	Response received
Redcar & Cleveland	314				n	Response received
Salford	485	706			y	Response received
Sefton	191				n	Response received
Staffordshire	3,124	2,913			y	Response received
Tameside	346	388			y	Response received
Trafford	462	294			y	Response received
Wakefield	1,640	1,359	58,295	18,737	y	Response received
Worcestershire	213	194			y	Response received

6.3 The enquiry made to the receiving WPA was in general terms and did not seek to confirm availability of capacity at specific waste management facilities. Therefore, even though responses have been received from half of the receiving WPAs, enquiries have been initiated to all identified WPAs this time including inquiries about availability of capacity at specific facilities to confirm or otherwise the resilience of possible future reliance on the continuation of these flows. The outcome of this engagement is summarised in Table 8 below.

Table 8: Target WPAs & DtC Status in 2025 by Response Status at July 2025

WPA	Facility	Response Received	Facility Status	SoCG Needed?
Wakefield	Ferrybridge EfW	Yes	Available	No
Wakefield	Welbeck Landfill	Yes	Not available beyond 2028	No
Wakefield	CJ Metals	Yes	Uncertain	No
Calderdale	Clockface Quarry Inert Site	Yes	Not available beyond 2030	No

WPA	Facility	Response Received	Facility Status	SoCG Needed?
Leeds City	Carr Crofts Waste Treatment Facility		tbc	Unlikely
Leeds City	Knostrop Waste Treatment Facility		tbc	Unlikely
Leeds City	Pepper Road		tbc	Unlikely
Leeds City	Unit 41, Knowsthorpe Way		tbc	Unlikely
Doncaster	Asphalt Waste Recycling Facility	Yes	Not available beyond March 2025	No
Sheffield	Parkwood Springs, Douglas Rd	Yes	Available	No
Sheffield	Ecclesfield Industrial Waste Treatment Facility	Yes	Available	No
N East Lincolnshire	Immingham MRF	Yes	Available	No
City of York	Harewood Whin Liquid Waste Treatment Plant		tbc	Unlikely
Rotherham	The New Depot		tbc	Unlikely
Stockton-on-Tees	Port Clarence Landfill Site		tbc	Unlikely
Stockton-on-Tees	Cleveland IBA		tbc	Unlikely
Sunderland	Hendon Dock Process Plant		tbc	Unlikely
Liverpool	Garston Distillation Services	Yes	Available	No
Cheshire West & Chester	Ellesmere Port Incinerator	Yes	Available	No
Cheshire West & Chester	Cheshire Waste Management Centre	Yes	Available	No
Lancashire	Unit 21-22 Roman Way		tbc	Unlikely
Bury	Pilsworth South Landfill	Yes	Available to 31st Dec 2028	No
Salford	CSG Lanstar (Cadishead)	Yes	Available	No
Trafford	Trafford Park Waste Oil	Yes	Available	No

WPA	Facility	Response Received	Facility Status	SoCG Needed?
Tameside	Sims Group UK, Stalybridge	Yes	Available	No
Derbyshire	Ilkeston Waste Treatment and Transfer Facility		tbc	Unlikely
Derbyshire	Norwood Recycling Centre		tbc	Unlikely
Nottinghamshire	Bilsthorpe Oil Treatment Plant	Yes	Available	No
Solihull	Cornets End Recycling Facility	Yes	Available	No
Sandwell	ERQ - STC, E	Yes	Available to 2042	No
Staffordshire	Stoke Waste Treatment & Transfer Facility	Yes	Available	No
Kent	Aylesford Metals Recycling Facility		tbc	Unlikely
Norfolk	Thetford WEEE Treatment Facility	Yes	Available	No

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Appendix 1: Welsh WPA receiving Hazardous Waste from Kirklees applying thresholds (2023)

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type	Total
Newport	Treatment	Newport Refrigerator Plant	Sims Group U K Ltd	WEEE	365

Appendix 2: Historical Cross Check: Destination WPAs of Hazardous, Non-inert and Inert Waste from Kirklees applying thresholds 2021-2023.

Highlighted cells: Orange - additional WPAs receiving strategically significant waste from Kirklees in 2021 and/or 2022
Blue – WPAs receiving strategically significant waste from Kirklees not identified in 2023
Source: WDI 2021, 2022 & 2023

Waste Type	Non-Inert	Non-Inert	Non-Inert	Inert	Inert	Inert	Hazardous	Hazardous	Hazardous
Facility WPA	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**
Barnsley	5,175	6,666	<5,000	<10,000	<10,000	<10,000	<100	<100	<100
Bradford City	<5,000	5,646	<5,000	0	<10,000	<10,000	<100	<100	<100
Bury	0	0	<5,000	0	0	0	0	0	686
Calderdale	<5,000	<5,000	<5,000	45,616	52,478	64,558	<100	<100	<100
Cheshire West and Chester	<5,000	<5,000		0	0	0	2,552	1,932	2,180
Derbyshire	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	1,211	1,568	4,974
Doncaster	<5,000	<5,000	8,175	<10,000	<10,000	<10,000	0	0	595
East Riding of Yorkshire	<5,000	<5,000	<5,000	<10,000	13,518	<10,000	0	0	0
Gateshead	<5,000	0	0	0	0	0	668	750	<100
Hampshire	0	0	0	0	0	0	308	0	0
Kent	<5,000	0	0	0	0	0	2,605	1,653	130
Kingston Upon Hull City	<5,000	6,661	5,602	0	0	0	<100	<100	<100
Lancashire	<5,000	<5,000	<5,000	0	0	0	146	1,150	1,079
Leeds City	22,814	21,875	23,213	<10,000	<10,000	<10,000	3,063	3,045	1,980
Liverpool	<5,000	<5,000	<5,000	0	0	0	1,348	1,633	2,852
Norfolk	<5,000	<5,000	0	0	<10,000	<10,000	381	188	100
North East Lincolnshire	0	0	0	0	0	0	0	657	881
North Yorkshire	9,217	7,161	5,973	<10,000	<10,000	0	0	221	0

Waste Type	Non-Inert	Non-Inert	Non-Inert	Inert	Inert	Inert	Hazardous	Hazardous	Hazardous
Facility WPA	2021	2022	2023	2021	2022	2023	2021	2022	2023
Nottingham City	<5,000	<5,000	<5,000	<10,000	0	0	125	<100	<100
Nottinghamshire	0	<5,000	<5,000	<10,000	0	<10,000	129	133	216
Rotherham	7,877	9,561	<5,000	<10,000	<10,000	<10,000	131	<100	228
Salford	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	228	706	551
Sandwell	<5,000	<5,000	<5,000	0	0	0	143	12,721	935
Sheffield	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	770	814	951
Solihull	0	0	0	0	0	0	0	0	1,978
Staffordshire	<5,000	<5,000	<5,000	0	0	0	3,760	2,913	253
Stockton-on-Tees	27,127	24,158	25,655	<10,000	0	0	816	182	595
Sunderland	<5,000	0	0	0	0	0	5,491	4,600	6,134
Tameside	<5,000	<5,000	<5,000	0	0	0	322	388	217
Telford and Wrekin	0	0	0	0	0	0	233	0	0
Trafford	<5,000	<5,000	<5,000	0	0	0	352	288	223
Wakefield	59,843	58,295	53,162	15,514	18,737	20,179	555	1,359	3,923
Walsall	<5,000	<5,000	<5,000	0	0	0	123	<100	<100
Worcestershire	<5,000	<5,000	0	0	0	0	0	192	<100
City of York	<5,000	<5,000	<5,000	0	0	0	183	1,315	869

Appendix 3: Destination Site receiving >5,000 tonnes of Non-Hazardous Waste from Kirklees in 2022 (no additional significant sites in 2021)

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 5,000t or more	Total
Barnsley	Treatment	Carlton Road Site	Glass Recycling (UK) Ltd	Glass from municipal sources	5,850

Appendix 4: Destination Site receiving >10,000 tonnes of Inert Waste from Kirklees in 2022 (no additional significant sites in 2021)

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 10,000t or more	Total
East Riding of Yorkshire	On/In Land[16]	Park Lodge Shooting School	Greenscape (Yorkshire) Ltd	Soils and stones	13,518

[16] Recovery to land operations have a finite life, so for the purposes of DtC engagement, the WPA should be contacted to confirm when the site is expected to be complete.

Appendix 5: Destination Sites receiving >100 tonnes of Hazardous Waste from Kirklees in 2021 or 2022

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 100t or more	2021	2022
Gateshead	Treatment	Gap Waste Management	P A Moody Recycling Ltd	WEEE	668	745
North Yorkshire	Treatment	The Maltings Organic Treatment Facility	The Maltings Organic Treatment Ltd	Oily waste	<100	218
Worcestershire	MRS	Long Marston Metal Recycling Centre	Sims Group UK Ltd	Multiple Wastes Sub 100 Tonnes	0	192
Hampshire	Incineration	Fawley High Temperature Incinerator	Tradebe Fawley Ltd	Wastes containing other dangerous substances	308	0
Nottingham City	MRS	Harrimans Lane	Sims Group UK Ltd	WEEE	124	<100
Telford and Wrekin	Treatment	AO Recycling Telford	AO Recycling Ltd	WEEE	233	0
Walsall	Transfer	Brownhills Environmental Management Facility	Red Industries (Brownhills) Ltd	Multiple Wastes Sub 100 Tonnes	123	<100