



Market Assessment Report

Seletia (HW) Limited

Hespin Wood Landfill,
Todhills,
Carlisle,
Cumbria,
CA6 4BJ



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1. Executive Summary

- 1.1. This Market Assessment Report has been prepared in support of an application to vary Environmental Permit EPR/ BM60261B for Hespin Wood Landfill, Cumbria. The application seeks to increase the annual input limits for:
 - Non-hazardous waste (from 132,000 to 750,000 tonnes/year).
 - Inert waste (from 50,000 to 100,000 tonnes/year).
- 1.2. The total permitted capacity of the landfill remains unchanged. The proposed variation affects only the rate at which waste may be deposited.
- 1.3. The increase in throughput is supported by existing waste supply contracts and by the Site's strategic location within the regional waste market, including potential cross-border flows from Scotland. The Environment Agency's request for a market assessment is addressed in Section 4.
- 1.4. In addition to market alignment, the primary strategic driver for the variation is to enable the Operator to:
 - Accelerate completion of landfilling and restoration.
 - Reduce the duration of environmental impact on nearby receptors.
 - Install required infrastructure (gas, leachate, capping) in accordance with permit conditions.
- 1.5. All existing environmental controls and the Operator's Environmental Management System will remain in place. No relaxation of standards or expansion of the Site is proposed.
- 1.6. The proposed variation is therefore considered to be necessary, reasonable and sustainable, and presents no additional environmental risk. In the absence of sufficient market demand, the Site would simply continue to operate under lower throughput amounts.



2. Introduction

- 2.1. This Market Assessment Report has been prepared by Westbury Environmental Limited to support a permit variation application submitted to the Environment Agency on behalf of Seletia (HW) Limited (Operator) Hespin Wood Landfill, Todhills, Carlisle, Cumbria, CA6 4BJ (Site).
- 2.2. The application seeks to vary Environmental Permit reference EPR/BM6026IB (the Permit) to increase annual waste input limits for non-hazardous waste and inert waste, without altering the total permitted capacity of the Site.
- 2.3. This report has been provided in response to a request from the Environment Agency for a market assessment to support the proposed increase in annual input tonnage. While market context is addressed, this report also outlines the wider strategic, operational, and environmental rationale for the proposed variation — particularly the Operator's intention to accelerate landfill completion and site restoration for the benefit of local receptors.
- 2.4. This structure of this Market Assessment Report is as follows:
 - Section 2 provides information on the purpose of the proposed Environmental Permit Variation.
 - Section 3 provides information on the market demand and contractual obligations that support the change.
 - Section 4 provides information on how the proposed changes are considered to be necessary, reasonable and sustainable.
 - Section 5 provides information on the Environmental Controls that will be implemented to support the proposed changes.
 - Section 6 provides a conclusion of the Market Assessment Report.



3. Purpose of the Proposed Variation

- 3.1. The Operator is seeking a variation to Environmental Permit EPR/BM60261B to revise the permitted annual input limits for certain waste types, while maintaining the overall permitted capacity of the landfill unchanged.

Proposed Changes

- 3.2. The following changes are proposed:
- Increase of the annual limit for non-hazardous waste from 135,000 to 750,000 tonnes per annum.
 - Increase of the annual limit for inert waste from 50,000 to 100,000 tonnes per annum.
 - Add waste code 18 02 03 (animal faeces, not subject to special requirements) to the list of non-hazardous wastes permitted for disposal
 - Add waste code 19 05 03 (off-specification compost) to the list of permitted wastes for restoration

Strategic Objectives of the Variation

- 3.3. The variation is intended to achieve the following objectives:
- Accelerate the completion of landfilling and enable earlier restoration of the Site.
 - Facilitate compliance with existing and anticipated contractual waste deliveries.
 - Support the timely installation of infrastructure (e.g. gas management, capping) that remains outstanding from previous operations.
- 3.4. These objectives align with the strategic direction of the new ownership, which prioritises prompt closure of the landfill and the delivery of environmental and amenity improvements for local receptors. By increasing the permitted input rates, the Operator can bring the site to completion more efficiently, reducing the long-term environmental footprint of the landfill operations.



4. Assessment of Market and Strategic Need

Market Context

- 4.1. The Environment Agency has requested a market assessment to support the proposed increase in annual waste input limits at Hespin Wood Landfill. This section outlines relevant market indicators, existing contractual arrangements, and the landfill's strategic location.
- 4.2. The Operator has in place a number of waste supply contracts that confirm the availability of material to support the increased throughput. These contracts include agreements with waste management companies and local authority collection schemes. [Note: details withheld for confidentiality but can be provided on request.]
- 4.3. In addition to existing contracts, the Site is geographically well-positioned to accept residual waste from Cumbria and surrounding regions, including northern parts of Lancashire, County Durham, and potentially from southern Scotland. While the implementation of Scotland's ban on biodegradable municipal waste to landfill (originally due in 2025) has been delayed, the long-term legislative trajectory continues to favour diversion of biodegradable waste from Scottish landfills, creating a potential cross-border need for disposal outlets compliant with regulatory requirements.
- 4.4. Market conditions also reflect continued demand for landfilling of non-recyclable residual waste, including outputs from mechanical treatment plants, non-inert construction and demolition waste, and waste unsuitable for recovery. Although data on Cumbria-specific waste arisings is limited in the public domain, the Operator's recent contract negotiations and discussions with regional waste producers indicate that available arisings are likely to be sufficient to meet the proposed tonnage increase.
- 4.5. The proposed permit variation does not seek to expand the total landfill capacity but only to increase the annual input limit, offering flexibility to manage material flows more effectively.

Strategic Need for Early Closure

- 4.6. The primary strategic driver for the proposed increase in annual throughput is to accelerate the completion of landfilling and restoration, thereby reducing the duration of potential environmental impacts on local receptors. The Site is located in close proximity to:
 - Residential areas including Todhills and Rockcliffe.
 - Protected habitats and species consisting of Ramsar Sites, SSSI, SACs and SPAs at Solway Firth and Upper Solway Flats and Marshes.
- 4.7. By enabling earlier final capping, infrastructure completion, and restoration, the Operator aims to:
 - Reduce the duration of emissions and nuisance (e.g. odour, dust, noise).
 - Minimise long-term disruption from HGV movements and site activity.
 - Deliver visual and amenity improvements through timely landscaping and aftercare.
- 4.8. The increase in annual input limits is therefore considered to align not only with market demand, but also with environmental and community objectives, which are central to the Operator's revised strategy for the Site.

Risk Management – Low Risk of Underutilisation

- 4.9. The Operator acknowledges that any increase in permitted annual tonnage must be justified to demonstrate that the change will not lead to environmental harm or inefficiency. In this case, the proposed variation introduces no increase in the total capacity of the landfill. The only change is the rate at which that capacity may be utilised.
- 4.10. If sufficient material is not available in the local market to meet the higher throughput, the landfill will continue to operate at the current or reduced rate. In this scenario, the variation will have no adverse environmental impact, nor will it result in non-compliance with the Permit. The proposed change merely allows for flexibility to accelerate operations where market conditions and infrastructure capacity allow.
- 4.11. This risk-neutral outcome ensures that the variation remains proportionate and environmentally protective, even under conservative market conditions.



5. Necessity, Reasonableness and Sustainability

Necessity

- 5.1. The proposed increase in annual input limits is necessary for multiple interrelated reasons:
- To facilitate compliance with permit infrastructure requirements, including timely capping, gas management infrastructure installation, and leachate control systems.
 - To enable the accelerated completion of waste infilling and final restoration in line with the Operator's revised site strategy.
 - To accommodate the volumes committed under existing contractual arrangements, which exceed the current annual tonnage limits.
- 5.2. These operational necessities arise not from speculative growth but from a strategic need to address underperformance by the previous operator, which resulted in incomplete capping and delayed infrastructure installation. Without the variation, the Operator would be unable to implement the necessary remediation, and improvement works at an efficient pace.
- 5.3. Under the existing Environmental Permit (EPR/BM60261B), Hespin Wood Landfill is required to install and maintain a range of infrastructure, including:
- Landfill gas extraction and management systems.
 - Leachate collection and treatment infrastructure.
 - Timely capping and surface water management.
 - Progressive restoration of completed cells.
- 5.4. These systems are typically installed sequentially as waste is deposited and cells are completed. However, if the volume of waste accepted is too low, the following compliance risks arise:
- Delayed cell completion → which in turn delays capping and restoration, contrary to permit conditions and best practice (e.g. sector guidance on emissions control).
 - Insufficient landfill gas generation → which may prevent optimal operation of gas extraction and flare systems, potentially resulting in fugitive emissions.
 - Prolonged operation of incomplete site infrastructure → which increases the risk of environmental incidents (e.g. odour, leachate overflow), and prolongs the period over which receptors are exposed to site impacts.
- 5.5. Therefore, by increasing the annual input limits, the Operator gains the ability to:
- Complete cells in a timely and controlled manner
 - Install and commission gas and leachate systems at appropriate operational intervals
 - Progressively cap and restore the landfill, as expected under the permit and sector guidance

Reasonableness

- 5.6. The proposed changes are considered reasonable in the context of:
- Confirmed availability of waste materials from multiple sources under contractual agreements.
 - Existing environmental controls (gas, dust, odour, noise, leachate) which have been reviewed and, where necessary, updated to accommodate the proposed operational rate.
 - The fact that no changes are proposed to the total capacity of the landfill, the permit boundary, or the nature of permitted activities.
- 5.7. Reasonableness is further supported by the Operator's commitment to transparent engagement with regulators and local stakeholders, and the intention to complete landfill operations and restoration in a shorter timeframe, reducing long-term disruption to local communities.

Sustainability

- 5.8. The proposed variation supports sustainability by:



- Reducing the operational lifespan of the landfill and the associated environmental footprint.
 - Enabling earlier landscape restoration, aftercare, and eventual return to beneficial post-closure land use.
 - Maintaining compliance with all existing permit conditions and environmental safeguards.
- 5.9. The Operator's Environmental Management System (EMS), including associated management plans (Odour, Dust, Noise, Gas, Fire Prevention, etc.), has been reviewed and will continue to ensure that environmental risks are appropriately managed throughout the accelerated operational phase.
- 5.10. The proposal does not increase the overall capacity or footprint of the landfill, and the increased rate of input will not compromise environmental compliance or site stability. In this context, the variation is consistent with the principles of sustainable waste management and environmental protection.



6. Environmental Controls

- 6.1. The proposed increase in annual input rates does not involve any change to the nature of permitted activities, the total landfill capacity, or the design of the site. The variation solely affects the rate at which the existing capacity may be utilised. All environmental control systems currently in place — and previously assessed by the Environment Agency — will remain in operation, with updates where appropriate to accommodate the increased operational tempo.
- 6.2. The following environmental controls will continue to be implemented as part of the Environmental Management System (EMS):
- Odour Management Plan – measures to manage odour emissions from waste acceptance, tipping, and capping activities, including proactive sulphur screening and rapid waste covering.
 - Dust Management Plan – dust suppression through water bowsers, road sweeping, and site speed limits.
 - Noise Management Plan – controls on plant operation hours, reversing alarms, and acoustic screening.
 - Gas Management Plan – active extraction and flaring of landfill gas, with infrastructure being upgraded to meet compliance standards.
 - Leachate Management Plan – regular leachate level monitoring and removal, with treatment on-site.
 - Surface Water Management – site drainage and runoff control remain unchanged and unaffected by the variation.
 - Fire Prevention Plan – control measures for storage of combustible waste prior to landfilling.
 - Mud, Litter and Debris Procedure – measures to prevent tracking onto highways and manage windblown litter.
 - Pest Management Plan – pest control through housekeeping and contractor visits.
- 6.3. All the above plans are included within the submitted EMS and were updated where relevant as part of the variation application.
- 6.4. The increase in annual throughput will result in more frequent waste deliveries and operational activity, but this will be balanced by:
- Accelerated completion of landfill cells and reduced long-term exposure.
 - Earlier installation of final capping and gas management infrastructure.
 - Enhanced operational oversight to ensure environmental protection is not compromised.
- 6.5. The Operator will continue to implement and maintain the EMS in full compliance with permit conditions. No relaxation or deferral of control measures is proposed. The variation simply allows for a more efficient execution of existing operations within a robust compliance framework.



7. Conclusion

- 7.1. This Market Assessment Report has been prepared in support of a permit variation application for Hespian Wood Landfill, which seeks to increase annual input limits for non-hazardous waste and inert waste. The total permitted capacity of the Site remains unchanged.
- 7.2. The proposed increase in annual throughput is:
 - Supported by existing and emerging contractual waste streams.
 - Strategically necessary to enable the Operator to complete landfilling and restoration works efficiently.
 - Reasonable and proportionate, given the current operational context and available infrastructure.
 - Fully compatible with the existing Environmental Management System and associated environmental control plans.
- 7.3. Importantly, the variation will enable the Operator to accelerate the delivery of environmental infrastructure, reduce the operational lifespan of the Site, and minimise long-term impacts on local communities.
- 7.4. In the event that market conditions result in lower-than-expected waste inputs, the site will simply continue to operate under a lower throughput rate, presenting no additional environmental or regulatory risk.
- 7.5. The proposed changes are therefore considered to be:
 - Necessary, in order to meet infrastructure and compliance obligations.
 - Reasonable, based on operational contracts and environmental benefits.
 - Sustainable, as no additional environmental burdens are introduced