

Rebecca Warren
Principal Permitting Team Leader
Environment Agency
Via email

Wednesday 19 November 2025

Ref: K0419/LT/005

Re: Enviroo Plot 13 Ince Marsh – K0419
Priority Request for Bespoke Permit Application

Dear Rebecca,

Thank you for your e-mail of 12 November 2025 in which you advised the withdrawal of the pre-application request and the submission of the full permit application. We can confirm that both these actions have now been undertaken.

We understand that the Environment Agency feel that additional information is required to demonstrate that the proposed Enviroo facility merits prioritisation, particularly information that demonstrates the contribution to:

- *national resilience;*
- *national infrastructure; and,*
- *environmental protection.*

This letter provides the additional information requested.

As the Environment Agency is aware the capacity for plastic recycling in the UK over recent years has decreased significantly, this is demonstrated by the recent closures of Biffa's Sunderland plastic recovery plant; Viridor's Avonmouth, Skelmersdale and Rochester plants and Vanden's Whittlesey plant.

The industry body Plastic Recyclers Europe¹ identified that by the end of 2025 Europe will have lost 1 million tonnes of plastic recycling capacity. This has resulted in an increase in exports of plastic waste.

Last year the UK exported around 600,000 tonnes of plastic waste an increase of 5% on the 2023 figure (ENDS²) and the total plastic waste exports in the first half of this year came to 317,747 tonnes.

¹ <https://www.plasticsrecyclers.eu/news/wave-of-surg-ing-plastic-recycling-plant-closures-hits-europe/#:~:text=The%20surge%20in%20low%2Dpriced,EU%20recyclers%20out%20of%20busine ss.>

² <https://www.endsreport.com/article/1909165/uk-plastic-waste-exports-increase-again-2024>

In October this year the Guardian reported³ that Britain's exports of plastic waste to developing countries increased by 84% in the first half of 2025. Exports to Indonesia a country facing a "severe plastic pollution crisis"⁴ amounted to 24,000 tonnes. In addition in 2023 the UK was the largest exporter of plastic waste to Turkey, recent reporting has highlighted the very poor health and safety record within Turkey's recycling industry⁵.

This reliance on overseas facilities is a concern of the UK Government. A recent BBC⁶ article reported that DEFRA confirming packaging reforms are being implemented, alongside £10bn of investment in new plastic sorting and processing facilities. With DEFRA also stating that the deposit return scheme, launching in October 2027, will create higher quality material for recycling, as consumers will be encouraged to return drinks bottles and cans to collection points to collect the small deposit they will have paid on purchase. The government has also convened a Circular Economy Taskforce. The Circular Economy Taskforce has identified five priority sectors where circular principles could deliver the most significant environmental and economic gains, these include plastics. The overall object of DEFRA is reported as "support UK-based recycling, meaning we can reduce our dependency on exports of plastic waste".

With regards to Enviroo's proposed facility, Stuart Foster, the Chief Executive Officer of RECOUP⁷ said "This project demonstrates what's possible when innovation is backed by evidence and industry collaboration. RECOUP was pleased to support Enviroo with the insight and due diligence needed to help secure investment for a facility that will play a vital role in the UK's plastics recycling future. It's a clear example of how targeted expertise can unlock progress toward circularity, reduce plastic waste, and strengthen domestic recycling infrastructure."

Clearly investment in UK plastic recycling is required to meet the objectives of the Government and to achieve a circular economy. In addition, the Enviroo facility will provide

- national resilience (i.e. removing reliance on plastic wastes recovery facilities abroad),
- a critical piece of national infrastructure, and
- support environmental protection by minimising export of plastic wastes and provide a new and high-performance recovery facility with minimal environmental impacts.

In addition to demonstrating national resilience, contribution to national infrastructure and environmental protection this project also contributes significantly to the local economy, providing over 70 new jobs and as such has the support of local government.

³ <https://www.theguardian.com/environment/2025/oct/09/britain-2bn-recycling-industry-export-plastic-waste>

⁴ <https://www.sciencedirect.com/science/article/pii/S0959652625014325>

⁵ <https://www.endsreport.com/article/1932516/listen-boy-wasted-bale-plastic-mystery-body-global-investigation>

⁶ <https://www.bbc.co.uk/news/articles/c5yv8e0prg9o>

⁷ <https://www.recoup.org/2025/08/11/recoup-supports-enviroos-groundbreaking-pet-recycling-plant-with-key-market-intelligence-and-policy-insights/>

Enviroo has been awarded a Local Enterprise grant from Cheshire West and Chester Council on competition of construction and go-live in August 2026, with the award of this environmental permit to operate, Enviroo will actively deliver on its obligations for growth and employment.

Enviroo is also committed to prioritise partnerships with local suppliers and service providers to stimulate regional enterprise development and strengthen the North West's economic resilience. The recruitment strategy will focus on creating high-quality jobs for the local skilled workforce, supported by structured training programmes in advanced recycling technologies to enhance skills and career progression.

In addition, Enviroo will embed sustainability and innovation into its operations by implementing recycling initiatives and resource efficiency measures, aligning with Cheshire West and Chester Council's net zero objectives. Through these commitments, Enviroo will ensure measurable impact on local employment, inclusive economic growth, and the development of a robust circular economy for the UK.

This facility represents a significant investment in the region and will act as a catalyst for local enterprise development. By working closely with regional suppliers and service providers, we aim to strengthen the local economy and create a resilient supply chain for sustainable circular plastics recycling.

Any significant delay in the permitting process resulting in the facility failing to become operation in August 2026 will jeopardise the delivery of this critical resilient infrastructure, and the environmental and economic benefits it would provide.

Enviroo are committed to this project and would like support from the Environment Agency to expedite the permitting process. In this regard Enviroo would like to offer a presentation detailing the facility and the opportunity to visit the construction site to view progress during the determination period. Should the Environment Agency wish to attend a presentation or visit the site please advise of convenient dates.

We believe that the additional information is sufficient to demonstrate the merits to the UK of prioritising this application. However, if you require any more detailed justification this can be provided.

Yours sincerely
For Ayesa,

John Baxter
Technical Director