

**FORD ENERGY RECOVERY FACILITY AND WASTE SORTING AND
TRANSFER FACILITY, FORD CIRCULAR TECHNOLOGY PARK**
PLANNING SUPPORTING STATEMENT ADDENDUM
FORD ENERGY FROM WASTE LTD, GRUNDON WASTE MANAGEMENT
LTD, VIRIDOR ENERGY LTD
JULY 2021



TERENCE
O'ROURKE

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Appendix 1 Letters of support

1.0 Introduction

- 1.1 This Planning Supporting Statement Addendum (PSS Addendum) has been prepared in support of application reference WSCC/0111/21 that was submitted by Ford Energy from Waste Limited, Grundon Waste Management Limited and Viridor Energy Limited (the applicants) to West Sussex County Council (WSCC) in April 2021.
- 1.2 The application proposes the construction and operation of an Energy Recovery Facility (ERF) and Waste Sorting and Transfer Facility (WSTF) on land at Ford Circular Technology Park, Ford, West Sussex.
- 1.3 In a letter of the 2nd July 2021 WSCC set out a request for further information / clarification in relation to the planning application. This was submitted under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Regulation 25 Further Information and Evidence Respecting Environmental Statements.
- 1.4 The letter included a range of information and clarification requests, including those that were said to be "additional information to be supplied (not requested under Regulation 25)".
- 1.5 The applicants' response is provided in a letter that addresses all the requests, with reference also to an Addendum to the Environmental Statement where this has been deemed necessary to address relevant points.
- 1.6 This document (PSS Addendum) has also been prepared to address queries that relate to matters covered in the original PSS including the shortfalls in capacity identified in the WSCC annual monitoring report, the low carbon status of the ERF, the potential for carbon capture and storage, and the potential for CHP.
- 1.7 Consequently, to arrive at a full picture of the applicants' response to WSCC's request under regulation 25 and other information/clarification not requested under regulation 25, this document should be read in conjunction with the Regulation 25 response letter and the ES Addendum.

2.0 The updated WSCC 2019/20 monitoring report

- 2.1 Whilst the proposal for an ERF and WSTF is on an allocated site in an up-to-date local plan, and so there is no policy requirement to demonstrate that a quantitative or market need exists, the PSS provided an outline of need for the proposed facilities. In looking at the shortfall to be met in West Sussex, this focused on the information in the most recent West Sussex monitoring report available at the time of submission, namely the West Sussex Joint Minerals Local Plan and Waste Local Plan: Annual Monitoring Report (for 2018/2019).
- 2.2 Under the heading of information not requested under regulation 25, the WSCC letter of 2 July asks for an "updated assessment of need and the sources of waste to be managed, taking into account the latest West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2019/20". This document was released in late June 2021.
- 2.3 This addendum therefore addresses the findings reported in this latest 2019/20 version of the Monitoring Report and provides an update in comparison with the previous 2018/19 version.

Monitoring Report 2018/19

- 2.4 The 2018/19 report identified a shortfall in recovery capacity of 270,000 tonnes per annum. This is the same shortfall as that identified in policy W1(d) of the WLP, indicating that there had been no delivery of this capacity to date, since the plan was adopted in 2014.
- 2.5 The report also referred to 320,000 tpa that is permitted but not operational.
- 2.6 This permitted capacity included a 140,000 tpa gasification facility at the application site, and 180,000 tpa of permitted capacity relating to an ERF allowed on appeal in February 2020 at the former Wealden Brickworks at Horsham. These had not yet been implemented.

Monitoring Report 2019/20

- 2.7 The position regarding the permitted (but not operational) capacity has not changed in the 2019/20 report as there have been no new permissions and the permitted capacity has not been delivered. This therefore stands the same at 320,000 tpa.
- 2.8 However the position on shortfall has changed. It is noted in paragraph 5.23 that for non-inert waste recovery, previous monitoring reports did not include the refuse derived fuel (RDF) output from the MBT at Brookhurst Wood when calculating the shortfalls. A footnote explains that RDF output is a waste, as concluded in paragraph 12 of the appeal decision on the recycling, recovery and renewable energy facility at the former Wealden brickworks at Horsham (WSCC/015/18/NH).
- 2.9 The report explains that this RDF is currently exported to continental Europe for energy recovery but should be included in the shortfalls to ensure that West Sussex is net self-sufficient in the management of waste arising in the county. The RDF output is estimated to be 206,010 tpa. The result is that the shortfall is therefore estimated at around 451,000 tpa.

- 2.10 Table 10 of the report sets out the updated shortfalls in annual capacity. For non-inert waste recovery, (MSW and C&I) it shows the shortfall based on operational capacity at 451,000 tpa.
- 2.11 The proposed ERF, at a capacity of 275,000 tpa, would go a long way to helping to meet this 451,000 tpa operational shortfall.
- 2.12 Table 10 also shows that considering the non-operational capacity of 320,000 tpa (140,000 tpa at the Ford CTP site plus 180,000 tpa at Horsham, both approved but not delivered) would leave a shortfall of 131,000 tpa.
- 2.13 However, the approved gasification EfW facility providing 140,000 tpa at Ford will not be delivered but will be replaced by the new ERF capacity. It remains the case that there is no guarantee that the Horsham facility will also be delivered, and that other facilities (such as the proposed ERF) are required to address the shortfall.
- 2.14 Even if the Horsham facility is delivered, it only provides 180,000 tpa leaving a shortfall of 271,000 tpa¹.
- 2.15 The Ford ERF is proposed to have a capacity of 275,000 tpa. This will therefore provide either a substantial contribution to meeting the 451,000 tpa shortfall without Horsham ERF, or a good fit with the remaining 271,000 tpa in the event that the Horsham ERF is delivered.
- 2.16 The capacity of the Ford ERF is therefore capable of securing capacity to meet a significant part of the shortfall identified in the most up to date monitoring report.
- 2.17 West Sussex needs recovery capacity such as that provided by the proposed ERF at the Ford site if it is to achieve net self-sufficiency in waste management capacity.

Sources of supply

- 2.18 The proposed ERF could source all its throughput from within West Sussex, given the level of operational shortfall in the county (451,000 tpa) identified in the 2019/20AMR. In the event that the Horsham ERF is delivered, there is still a shortfall of 271,000 tpa that the proposed ERF can service.
- 2.19 Note that, in terms of balancing for net self-sufficiency in the county, the ERFs capacity counts in full irrespective of the sources of arisings it receives.
- 2.20 The applicants are confident that contracts can be secured for a significant proportion of the West Sussex residual waste shortfall (C&I and MSW), given that the location at Ford is central to the county's urban coastal strip and easily accessible from the county's other main urban areas.
- 2.21 The ERF will potentially secure residual waste arisings from within a reasonable catchment area by road that will include neighbouring historic counties. The prohibitive costs associated with transporting waste by road over long distance mean that imports from further afield are unlikely to be economic.

¹ The identified 451,000 tpa operational shortfall minus 180,000 tpa if Horsham ERF is delivered leaves a remaining 271,000 tpa shortfall.

2.22 In conclusion, the information in the 2019/20 monitoring report shows that, whilst a proposal for energy recovery in accordance with the development plan does not have to demonstrate need, there is an identified shortfall in West Sussex that indicates a continuing need for the proposed capacity.

3.0 Low carbon and renewable energy

- 3.1 Under the heading of information not requested under regulation 25, the WSCC letter of 2 July states the following:

Provide clarification of the basis for the conclusion that the proposed development could be considered a 'low carbon technology' (in comparison to the use of conventional fossil fuels) and 'renewable energy source', including the extent to which this would be reliant on the feedstock (and biodegradable fractions thereof).

- 3.2 The NPPF 2019 includes the following definition of renewable and low carbon energy in its glossary:

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

- 3.3 The ERF process is acknowledged as a low carbon technology by current national policy. Energy from waste is currently the lowest carbon solution for waste that is not technically and economically recyclable. As well as putting waste to further use, it provides reliable, decentralised electricity and can support zero carbon local heat networks.
- 3.4 Note that the definition of renewable energy includes "from biomass". This means that the biomass in residual waste arisings is considered in the NPPF to be a source of renewable energy. This is reflected in national policy and guidance documents and is why the ERF is a low carbon technology, as it uses a partially renewable energy source.
- 3.5 Energy from Waste; a guide to the debate (Defra 2014) identifies mixed residual waste as a partially renewable energy source. It explains that this is because part of this residual waste will come from things made from oil like plastics, and part from things that were recently growing and are biodegradable (i.e. that break down in landfill), such as food, paper, and wood. It states that only the energy generated from the recently grown materials in the mixture is considered renewable, and that energy from residual waste is therefore a partially renewable energy source, sometimes referred to as a low carbon energy source.
- 3.6 Therefore under current national energy policy and guidance the energy produced by the ERF can be classed as low carbon because part of the feedstock is biodegradable and therefore renewable. For example, National Policy Statement for Energy (EN-1) recognises that energy produced from the biomass fraction of waste is renewable.
- 3.7 The National Policy Statement for Renewable Energy Infrastructure (EN-3) confirms that electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy.
- 3.8 Because of this, the proposals in the planning application will contribute to national commitments to increase energy generation from renewable and low carbon sources, to assist in tackling global climate change.

- 3.9 A variable part of the residual waste feed stock will be biogenic in origin, so would qualify as 'renewable' energy generation.
- 3.10 It is widely accepted that whilst, in general, energy from waste facilities are not in themselves carbon neutral or carbon zero, they do provide for the management of residual waste for which the only other option is presently landfill, and they do generate energy from a partially renewable (and therefore low carbon) source. It is also clear in national and local waste policy, and in the waste hierarchy, that landfill is at the bottom of the hierarchy, and energy from waste is an acceptable recovery process that sits above this.
- 3.11 The carbon impact associated with the ERF will be dependent on the quantity of biogenic carbon in the waste. Government strategy emphasises the aim to reduce the amount of both plastics and food waste in residual waste, as well as improving consistency in recycling, which should result in less fractions of paper/card (fibres) and other recyclates present in residual waste. The reduction in either plastics or food waste/fibres would have opposing impacts on the waste composition. A decrease in plastic waste would create a higher biogenic waste composition and so decrease the carbon emissions and increase the net carbon benefit. Whereas a decrease in food/fibre waste would create a lower biogenic waste composition and so increase the carbon emissions and decrease the net carbon benefit. If it is assumed that there is a similar reduction in both, the associated carbon impacts of both changes would to some extent cancel each other out.
- 3.12 Initial review of recent published waste composition information suggests that both plastic waste and food waste volumes have reduced over the last decade, with a slight decrease in the biogenic composition of residual municipal and commercial and industrial waste. Should the biogenic content of waste received at the ERF decrease compared to the composition assumed within the carbon assessment, it would result in an increase in carbon emissions from processing residual waste at the ERF and so would decrease the net carbon benefit of the ERF. However, this is difficult to predict or quantify without further information on waste patterns or understanding how effective local and national waste reduction strategies will be in the future.
- 3.13 The recently published Committee on Climate Change technical report envisages a future generation mix where renewables dominate, which includes power generation from both hydroelectric plants and energy from waste plants (the model assumes these make up to approximately 2% of total generation). The continued development and investment in low carbon technologies will be key in the UK achieving its target of net-zero. The intermittency of renewables is recognised within the technical report and there is support for base-load low-carbon plants. Consequently, it is considered that energy from waste will play a key role in future UK power generation and the UK achieving its target of net-zero.
- 3.14 Carbon emitted from low-carbon technologies has the potential to be captured through Carbon Capture & Storage (CCS) systems. Although CCS technologies are still being developed and are currently not economically or technically feasible for application in large-scale EfW projects, EfW plants are expected to have the potential to incorporate CCS technologies in the future.
- 3.15 The applicants acknowledge that low carbon technologies will need to continue to minimise carbon emissions, which will take time, legislative intervention and investment. Therefore, the ERF will lie within a framework where a positive contribution can be

made towards achieving climate change objectives and supporting the UK's transition towards meeting its net zero targets.

- 3.16 It is considered that a direct comparison with conventional fossil fuels is not appropriate, as the purpose of the ERF is not to replace fossil fuels, but rather to divert residual waste from landfill. Power generated by an ERF is a desirable outcome of landfill diversion and recovers energy from both the biogenic and non-biogenic fractions in the waste. Conventional fossil fuel power stations use fuels extracted specifically for the purposes of power generation, rather than using a residual material (waste) as a resource that is already available. Therefore, for the purposes of the carbon assessment, it is incorrect to treat the ERF as merely a power station, as conventional power stations do not divert waste from landfill.
- 3.17 In sending residual waste to the ERF rather than landfill, it will generate additional power, and will also release carbon from the incineration of the waste. As stated within section 4.1 of the carbon assessment, the 'effective' net carbon emissions of the ERF for the additional power generated compared to landfill are calculated to be -0.125 t CO₂e/MWh (the 'effective' carbon intensity compared to the baseline). This demonstrates that the ERF will be a low carbon technology when compared to the assumed baseline for disposal of the waste in a landfill.

4.0 Carbon capture and storage

- 4.1 Under the heading of information not requested under regulation 25, the WSCC letter of 2 July states the following:

Provide clarification as to whether Carbon Capture and Storage could be realistically 'retrofitted'.

- 4.2 Carbon emitted from low-carbon technologies has the potential to be captured through Carbon Capture & Storage (CCS) systems (sometimes also referred to as Carbon Capture Utilisation and Storage, CCUS, when the extracted carbon is used in product manufacture or processes rather than just stored).
- 4.3 A range of CCS technologies are actively being developed but are currently at an early stage of development with more evidence needed before they can be proven to be economically and technically feasible for wide application in large-scale energy from waste projects.
- 4.4 It can be expected that in parallel with the maturation of the technology, there will be future changes to legislation to require CCS/CCUS. This may be a matter for the Environmental Permitting process, and any Environmental Permit at Ford would be subject to review from time to time to allow for this.
- 4.5 Relevant background includes that in July 2021 the Environmental Services Association published a net zero greenhouse gas emissions strategy for the recycling and waste management sector in the United Kingdom. The Environmental Services Association (ESA) is the trade body representing the UK's recycling and waste management industry, and the applicants (Viridor and Grundon) are members.
- 4.6 The strategy explains how the ESA and its members will actively work with government to ensure that current technical, environmental and economic challenges around CCUS are quickly addressed to allow the sector to invest in these technologies. With the right regulatory and policy framework in place, the ESA believes that the sector can start fitting CCUS to EfW facilities as early as 2025, the first examples depending on local and site-specific factors. The intention is that all plants would be fitted with CCUS, where feasible, by 2040.
- 4.7 The ESA will monitor, support and trial CCUS technologies over the strategy period, with regular viability reviews. In addition, the ESA will work with its members to better understand and share guidance on the criteria that EfW plants need to meet to be CCUS-ready.
- 4.8 Notably one of the joint applicants, Viridor, has also (in June 2021) set out plans to become a net zero emissions company by 2040. Viridor has a far-reaching aim to become the first UK net negative emissions waste and recycling company by 2045, allowing it to support the country's commitment to reach net zero by 2050.
- 4.9 By 2045, Viridor aims to remove more human related GHG emissions than its operations produce, helping the UK as a whole hit its net zero goals.
- 4.10 In addition to boosting recycling rates to cut the amount of waste going to its fleet of ERFs, a key part of Viridor's strategy is to invest in CCS.

- 4.11 CCUS forms a major part of Viridor's wider five-step roadmap to deliver on its commitment to being a leader on tackling climate change, which include:
- Reducing direct emissions from all core operations – by driving more efficient processes that lower GHG emissions, including for landfill
 - Maximising the amount of waste that is recycled and reused – by investing in new reprocessing facilities and reducing the amount of waste going into energy from waste facilities
 - Capturing and storing carbon emissions from strategic sites – by 2040 installing CCUS infrastructure to capture at least 1.6MTCO₂ every year
 - Generating negative emissions by expanding carbon capture across Viridor's national network – by investing in new technologies and exploring products that can be created from CO₂
 - Supplying more homes and businesses with clean heat – by seeking to use recovered heat from its energy from waste facilities to drive wider decarbonisation.
- 4.12 There is therefore a strong direction of travel not only in potential emerging policy but also in the strategies of the waste management industry as a whole, and the applicants' in particular, of a move towards CCS as quickly as is feasible and in line with the maturation of CCS technological systems to allow this.
- 4.13 In conclusion an appropriate type of CCS system could be retrofitted to the proposed Ford ERF once the technology has matured to a point where it is feasible to do so. It is therefore realistic to retrofit CCS technology to the proposed ERF when the time is right.

5.0 Combined heat and power update

- 5.1 The WSCC letter of 2 July did not specifically request an update on the position regarding combined heat and power (CHP) potential.
- 5.2 However, since submission of the planning application in April 2021, the applicants have continued to explore the potential to find appropriate customers for the heat and power from the ERF, which will be CHP ready.
- 5.3 Whilst the design of the plant is such that it will qualify as a 'recovery' facility on electricity generation alone, the export of heat as well as electricity will increase the efficiency of the facility. Hence the identification of potential heat customers is an ongoing process that will help to secure future efficiencies should opportunities arise.
- 5.4 This also aligns with strategies such as the ESA's Net zero greenhouse gas emissions strategy for the recycling and waste management sector in the United Kingdom (July 2021) and Viridor's Decarbonising our waste: Viridor's roadmap to net zero and net negative emissions (June 2021).
- 5.5 The submitted CHP report identifies potential customers close to the site at Rudford Industrial Estate and HMP Ford, and also opportunities at the adjacent Ford strategic housing site and glasshouses further afield.
- 5.6 Since the report was written, the applicants have been approached by the West Sussex Growers Association WSGA who have consulted with its membership and established serious interest from several major horticultural businesses in developing a potential "Combined Horticultural Production and Energy Hub" partnership with the proposed ERF at Ford.
- 5.7 The West Sussex Growers' Association is a specialist horticultural branch of the National Farmers' Union. The membership is made up of those around the West Sussex area who have a strong interest in horticulture.
- 5.8 West Sussex Growers' are a significant part of the local economy with a retail value of in excess of 1 billion pounds per year and employing over 10,000 full-time equivalent staff. With rapid advances in technology, increasing numbers of these jobs are highly skilled and of high value. In addition, the industry supports many ancillary businesses and jobs in the area.
- 5.9 The potential extends to not only existing large areas of glasshouses at Wicks Farm and Barnham, but also to future glasshouses that might come forward on land to the north and east of the site, subject to planning permissions.
- 5.10 Relevant correspondence in support of the ERF and outlining the horticultural industry interest is included as an appendix to this document.
- 5.11 Discussions with the Ministry of Justice/HMP Ford have also gathered momentum regarding the potential for heat and power to be supplied from Ford ERF.
- 5.12 In addition, Impress Plastics, a business located in Harwood Road in Littlehampton, has also expressed an interest in taking some power from the ERF.

Appendix 1

Letters of support

30th June 2021

To:

Councillors and Senior Officers at WSCC and ADC

MPs: Nick Gibb, Gillian Keegan and Andrew Griffith

Directors at Grundon/Viridor,

RE: GRUNDON / VIRIDOR, ENERGY RECOVERY FACILITY (ERF), FORD

This letter sets out the West Sussex Growers' Association's (WSGA) interest in the above proposed development. Through the capture of waste heat, this ERF has the potential to support a significant amount of new, high tech, horticultural glasshouses in the immediate area.

WSGA members include major commercial growers in the Arun and Chichester Districts. These businesses make a major contribution to the local economy, producing crops with a value of over £1billion per annum and employing more than 10,000 full-time staff.

UK Horticulture is facing both challenges and opportunities in terms of environmental sustainability and food security. The industry is focused on reducing food-miles and carbon emissions and increasing the UK supply of fresh produce to the home market. Currently, more than 75% of the fresh UK market is met by imports.

Sustainable food production and low carbon-energy are inextricably linked. Producing high quality fresh produce in glasshouses requires year-round inputs of heat and energy. Low carbon energy from projects such as this ERF gives home-grown crops the edge required to displace imports. As such, 'Horticultural Production and Energy Hubs' are now attracting significant investment UK wide.

The proposed ERF at Ford includes Combined Heat and Power (CHP) technology capable of delivering thermal energy to the local area at a level that would fully satisfy the heat requirements for glasshouse developments at commercial scale. The close proximity and small number of commercial growers involved in a potential partnership would also be highly attractive to the ERF operator, in terms of efficiency of infrastructure, finance, operational and management requirements.

The carbon assessment for the ERF predicts a significant net reduction in greenhouse gas emissions based on the capture of power alone. Partnering with the local Horticultural Industry to use surplus heat would support sustainable food production and allow the ERF to reach its full potential in terms of carbon benefits.

Taking into account the existing and planned developments at Ford; there is sufficient suitable land available to develop new glasshouses surrounding HM Prison, Southern Waters' site and the proposed ERF site. Such horticultural development would also act as a land-use 'buffer' which would benefit residential developments proposed nearby.

Based on the above, WSGA have consulted with its membership and established serious interest from several major horticultural businesses in developing a potential "Combined Horticultural Production and Energy Hub" partnership with the proposed ERF at Ford.

We look forward to discussing these proposals further with all parties and supporting the progression of this project in any way that we can.

Yours sincerely,

Richard Hopkins – Chairman

01st July 2021

To:

**Councillors and Senior Officers at WSCC and ADC
MPs Nick Gibb, Gillian Keegan and Andrew Griffith
Directors at Grundon/Viridor,**

RE: GRUNDON / VIRIDOR, ENERGY RECOVERY FACILITY (ERF), FORD

Further to our introduction by the West Sussex Grower's Association (WSGA), this letter sets out our interest in the above proposed development.

Agricultural Investments Ltd is based in Ford, West Sussex. We are a horticultural business which currently operates 6.1 ha glasshouses, growing predominantly soft fruit with a retail value of approximately £4.9 M. We anticipate expanding our UK operations by approximately 550 % over the next 5-10 years.

It is fundamental to our operational strategy & customer requirement that we transition fully to low-carbon heat and power sources in due course. Direct, local sources of low carbon energy are the most efficient model.

The facilities at Ford are of a modern innovative designed to produce low carbon soft fruit. However the heat source for the growing crop is still a major contributor as this energy source is fossil fuel derived. Before we progress with any significant production expansion we are focused on finding a reduced impact heat source.

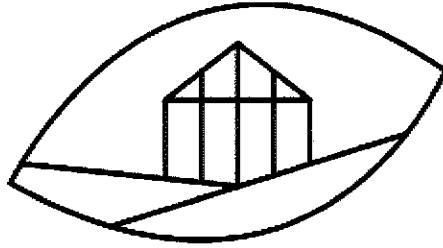
The proposed ERF at Ford could offer us both the land and direct source of low-carbon heat and power we require for the future horticultural development.

We would be very pleased to meet the key stakeholders of this project to demonstrate the phylosify behind the ways of working in respect of low carbon soft fruit production & to discuss the possibilities of an operational partnership further.



David Moore
Director of Agriculture

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GREEN
house
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Neil Stevenson
David Stevenson

**To: Councillors and Senior Officers at WSCC and ADC
MPs Nick Gibb, Gillian Keegan and Andrew Griffith
Directors at Grundon/Viridor,**

RE: GRUNDON / VIRIDOR, ENERGY RECOVERY FACILITY (ERF), FORD

Further to our introduction by the West Sussex Grower's Association (WSGA), this letter sets out our interest in the above proposed development.

The Green House Sussex Ltd is based in Barnham, West Sussex. We are a horticultural business which currently operates 10ha glasshouses, growing predominantly tomatoes with a retail value of approximately £9M. We anticipate expanding our UK operations by approximately 50 % over the next 5-10 years.

It is fundamental to our operational strategy that we transition fully to low-carbon heat and power sources in due course. Direct, local sources of low carbon energy are the most efficient model.

Our group is currently involved in the 16ha low carbon greenhouse site in Norwich which is using heat via heat pumps from the nearby waste water treatment plant. We are also investing in a 22ha site in Ely using the same principle but this time using reservoir water.

The proposed ERF at Ford could offer us both the land and direct source of low-carbon heat and power we require for the future horticultural development.

We would be very pleased to meet the key stakeholders of this project to discuss the possibilities of an operational partnership further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Diplock', written in a cursive style.

Richard Diplock
Managing Director
The Green House Sussex Ltd.