



The Rt Hon Greg Hands MP

Department for Business, Energy and Industrial Strategy
London
SW1H 0ET

The Rt Hon Michael Gove MP

Department for Levelling Up, Housing & Communities
London
SW1P 4DF

CC: The Rt Hon Kwasi Kwarteng MP, Lord Callanan

14 April 2022

Dear The Rt Hon Greg Hands MP and The Rt Hon Michael Gove MP,

Geothermal to Receive same Planning Weighting as Oil and Gas Projects

We are writing to you from the Association for Renewable Energy and Clean Technology (REA), on behalf of our geothermal member to arrange a joint meeting with you both, to discuss giving geothermal the same weighting as oil and gas projects in planning guidance. Whilst we understand planning is primarily the responsibility of the DLUHC we believe it is important BEIS is included as this is an energy issue.

You will be aware that with current technology deep geothermal energy is not ubiquitous in the UK, with sub surface constraints dictating where a commercial prospect can be located. This will be where suitable granite rock formations can be found or accessible aquifers located. The National Planning Policy Framework (NPPF) 2021 defines deep geothermal as a renewable and low carbon energy. Under paragraph 158 of this framework determining renewable and low carbon development, local planning authorities are expected to identify suitable areas for renewable energy development. However, the nascent nature of deep geothermal means that local authorities have not yet identified "suitable areas" within their local plans. This leads the developer to undertake an onerous and expensive process trying to persuade the local authority the reasons why it needs to use a particular site.

Deep geothermal energy has very similar attributes and behaviours to mineral development. Most notably oil and gas exploration, appraisal and production. The development uses the same drilling rigs and well testing spreads and similar layouts to onshore oil and gas sites. This is characterised by temporary use of equipment to drill and test the wellbores and long-term low-level production equipment. The NPPF provides very clear guidance for planners to assess mineral development when a site is located in sensitive areas. Paragraph, 209 of the NPPF states: "Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be

THE ASSOCIATION FOR RENEWABLE ENERGY AND CLEAN TECHNOLOGY

Brettenham House, 2-19 Lancaster Place, London, WC2E 7EN

Tel: +44 (0)20 7925 3570 Email: info@r-e-a.net Web: www.r-e-a.net

Company no: 04241430 Registered in England and Wales



made of them to secure their long-term conservation”. Deep geothermal heat can only be worked where it is found as it is dictated by subsurface geological features. Our member’s intention for their deep geothermal well is for baseload electricity generation, therefore deep geothermal heat could be argued as a source of energy, like that of oil and gas. Thus, geothermal should be given the same guidance in local planning as mineral extraction.

Due to the above issues with local planning, our member has engaged in a site selection process which has identified that when housing, national parks and areas in flood risk are considered, it leaves very limited areas to locate a commercial operation. This in turn is sterilising access to a potential world class subsurface resource and is also likely to afflict others looking to develop deep geothermal projects as the industry expands. Therefore, a geothermal alignment with mineral style weighting will help planners appreciate the sub surface constraints that operators face when identifying and locating surface sites.

Our aim is to promote a balanced approach to site location that allows operators to engage and design sites which are in keeping with the local area while accessing the geothermal sub surface. Onshore oil and gas sites enjoy this weighting and there are many examples of sites successfully established across the UK.

We hope we can work together to address the issues our member faces and help ease a wider holistic change to local planning guidance. We look forward to arranging a meeting with you both at your earliest possible convenience.

Yours sincerely,

Dr Nina Skorupska CBE FEI, Chief Executive, REA