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Department for Energy Security and Net Zero
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August 5, 2026

To Whom It May Concern,

Response to Consultation on an Updated Approach to Managing Onshore Wind Turbine Interference with Eskdalemuir Seismic Array

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 375 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainably heat and power Scotland's homes and businesses.

SR has coordinated the industry's engagement on the Eskdalemuir Seismic Array since the reconvening of the Eskdalemuir Working Group (EWG) in 2018, on which we continue to sit, and we have hosted the technical outputs of that work on behalf of the sector. We therefore welcome the opportunity to respond to this consultation. This is a high-level response that sets out our members' collective position with a number of our members planning to submit their own detailed responses, and we would encourage the Department for Energy Security and Net Zero (here on referred to as 'the Department') and the Ministry of Defence (MOD) to read this letter alongside those individual submissions.

1. A solution is needed, and needed quickly

There is strong support from across our membership for a solution to the Eskdalemuir constraint to be developed and implemented as soon as possible. As matters stand, we estimate that between 2GW and 6GW+ of onshore wind is being held back within the Consultation Zone at precisely the moment when renewable energy has clear and consistent support from both the UK and Scottish Governments. Onshore wind is a mature, low-cost and deliverable technology, and the capacity currently locked behind the Array represents a material contribution to Clean Power 2030 and to Scotland's wider net-zero and energy security objectives.

In reaching this position, we have engaged extensively with our members. We have held a number of onshore industry meetings with representation from over 100 members, conducted bilateral conversations with individual members and received a range of correspondence on the issues this consultation seeks to resolve. From that engagement, it is clear that there is broad consensus to see a sustainable solution, which can be delivered as quickly as possible.

On that basis, SR formally supports the delivery of a resolution to the Eskdalemuir Array. Such a resolution would release renewable energy generation at scale and should be brought forward quickly, to enable projects to come forward in accordance with the policies set out in the statutory development plan, unless material considerations indicate otherwise. We would strongly urge the Department and the MoD to provide clarity on the solution they intend to adopt and to deliver it as early and as efficiently as possible. No further delay can be afforded, and we would encourage the Department to proceed with laying the necessary regulations once the consultation has closed.

2. Members views on Seismic Headroom and consultation

The consultation necessarily goes into considerable detail on the available headroom, the Seismic Impact Limit (SIL), the treatment of repowering, and the range of possible technical solutions. SR can be clear that maximising renewable deployment should be considered a top priority of this work. SR would encourage the Department to favour policies which enable development, both based on the current and future pipeline, and which carefully balance the potential technical implications on developments.

SR has consulted its members on these matters and, in doing so, has heard a genuinely wide array of views and opinions both on the type of solution that should be adopted and for repowering on where the line should be drawn as to which projects retain, and which relinquish, seismic budget. Members are best placed to respond on the detail of the consultation given their individual project circumstances and their technical knowledge of the impacts being faced by their respective projects.

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3. An enduring framework

While speed of implementation is our members' immediate priority, we would ask that the framework is designed to evolve as evidence and operational experience accumulates. Our members support a framework to be developed and implemented whereby further evolution of the mitigation solution(s) can be transparently considered.

4. Continued engagement

SR strongly supports the delivery of workable, enduring solution(s) for Eskdalemuir and wishes to see it succeed. The continued and improved coexistence of renewable energy and defence infrastructure is key if we are to achieve governmental priorities for clean and secure power. With this goal in mind, we and our members would welcome the opportunity to continue working with the Department, the MOD and the Scottish Government through the Eskdalemuir Working Group and otherwise, both to help refine the approach and to support its swift implementation. Please do not hesitate to contact me should it be helpful to discuss any aspect of this response.

Yours sincerely,

A handwritten signature in black ink, reading "Colin J. Palmer". The signature is written in a cursive style with a large, stylized 'C' and 'P'.

Colin Palmer

Director of Policy - Onshore and Offshore Delivery
Scottish Renewables