



Berwick Bank Wind Farm

Additional Environmental Information (AEI) Submission

**AEI03: Supplementary Information
Section 5 Analysis of NatureScot RIAA Conclusions**

Revision Information

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Acronyms

Acronym	Description
AEI	Additional Environmental Information
AEOSI	Adverse Effect on Site Integrity
RIAA	Report to Inform Appropriate Assessment
SPA	Special Protection Area

1. Summary of Predicted Mortalities Based on NatureScot RIAA Conclusions

1.1. Introduction

Within the Derogation Case submitted as part of the Section 36 Application, the Applicant provided a summary of predicted mortalities of the four species (kittiwake, puffin, guillemot, razorbill) assessed as having Adverse Effect on Site Integrity (AEOSI) under the worst-case scenario (Scoping Approach 'B') in Part Three of the Report to Inform Appropriate Assessment (RIAA).

In their consultation response to the Section 36 Application, NatureScot stated that “*With respect to Scottish SPAs, we agree with the assessment within the RIAA (Part 3 – SPA Assessment – 9 December 2022) that there will be an Adverse Effect on Site Integrity for the following SPAs and qualifying (breeding) features, either alone or in-combination as a result of displacement effects (auk species only) or combined displacement and collision mortality:*

- *Buchan Ness to Collieston Coast SPA for kittiwake;*
- *East Caithness Cliffs SPA for kittiwake, razorbill, breeding seabird assemblage;*
- *Forth Islands SPA for guillemot, kittiwake, puffin, razorbill, breeding seabird assemblage;*
- *Fowlsheugh SPA for guillemot, kittiwake, razorbill, breeding seabird assemblage;*
- *North Caithness Cliffs SPA for kittiwake, breeding seabird assemblage;*
- *Outer Firth of Forth and St Andrews Bay Complex SPA for guillemot, kittiwake, puffin, breeding seabird assemblage;*
- *St Abb’s Head to Fast Castle SPA for guillemot, kittiwake, razorbill, breeding seabird assemblage;*
- *Troup, Pennan and Lion’s Heads SPA for kittiwake.*
- *West Westray SPA for kittiwake.”*

With respect to Scottish Special Protection Areas (SPAs), NatureScot concluded an AEOSI (or were unable to conclude No AEOSI) either alone or in-combination for an additional number of designated sites and features, including:

- Forth Islands SPA for gannet;
- Hermaness, Saxa Vord and Valla Field SPA for gannet;
- Outer Firth of Forth and St Andrews Bay Complex SPA for gannet;
- Outer Firth of Forth and St Andrews Bay Complex SPA (non-breeding) for razorbill, kittiwake, guillemot and seabird assemblage;
- Troup, Pennan and Lion’s Heads SPA for razorbill and breeding seabird assemblage;
- West Westray SPA for breeding seabird assemblage (kittiwake).

This note provides an update to Table 18 of the Derogation Case, to summarise predicted mortalities for the conclusions drawn by NatureScot in relation to the above additional sites and features. As outlined in the Derogation Case and the AEI Submission Supplementary Information – Note on Precaution, this worst-case approach is considered by the Applicant to overestimate precaution, but it is presented here to allow Scottish Ministers to consider all the potential requirements for compensation and, therefore, all measures put forward as options.

1.2. Predicted mortality based on NatureScot conclusions

Table 1.1 presents predicted annual adult mortality from the Proposed Development for SPA qualifying features for which NatureScot concluded an AEOSI (or were unable to conclude No AEOSI). The mortalities for gannet and kittiwake represent a combined impact value for collision and displacement. The mortalities for all other species are a result of displacement only. Predicted impacts on qualifying features of the Outer Firth of Forth and St. Andrew's Bay Complex SPA are covered under the totals presented for the functionally-linked breeding colony SPAs.

Table 1.1 The predicted annual adult mortality from the Proposed Development for SPA qualifying features for which NatureScot concluded an Adverse Effect On Site Integrity (AEOSI; or were unable to conclude No AEOSI) either alone or in-combination with other plans or projects. Predicted mortalities are those estimated under the worst-case Scoping Approach (B).

Species	SPA	Predicted Mortality – Scoping Approach (B)
Gannet	Forth Islands	245
	Hermaness, Saxa Vord and Valla Field	4
TOTAL		249
Guillemot	Forth Islands	181
	Fowlsheugh	473
	St. Abb's Head to Fast Castle	576
TOTAL		1,230
Kittiwake	Buchan Ness to Collieston Coast	21
	East Caithness Cliffs	41
	Farne Islands	35
	Flamborough and Filey Coast	38
	Forth Islands	43
	Fowlsheugh	131
	North Caithness Cliffs	10
	St. Abb's Head to Fast Castle	371
	Troup, Pennan, and Lion's Heads	18
	West Westray	12

Species	SPA	Predicted Mortality – Scoping Approach (B)
TOTAL		720
Puffin	Forth Islands	30
TOTAL		30
	East Caithness Cliffs	15
	Forth Islands	19
Razorbill	Fowlsheugh	23
	St. Abb's Head to Fast Castle	14
	Troup, Pennan and Lion's Heads	3
TOTAL		74

1.3. Summary

Table 1.2 compares the conclusions drawn in the Section 36 Application regarding predicted mortality totals for SPA qualifying features and those outlined in Table 1.1 based on conclusions drawn by NatureScot in their consultation response.

Table 1.2 Summary of the total predicted annual adult mortality from the Proposed Development for SPA qualifying features. Totals presented are those outlined in the Derogation Case submitted under the Section 36 Application, and those for which NatureScot concluded an Adverse Effect On Site Integrity (AEOSI; or were unable to conclude No AEOSI). Predicted mortalities are those estimated under the worst-case Scoping Approach (B).

Species	Total Predicted Mortality (Scoping Approach B)		
	Section.36	NatureScot	Difference
Gannet	0	249	+ 249
Guillemot	1,230	1,230	No change
Kittiwake	699	721	+ 22
Puffin	30	30	No change
Razorbill	71	74	+ 3