



John Swinney MSP  
First Minister

Copy: Gillian Martin MSP  
Acting Cabinet Secretary for Net Zero and Energy

Scottish Government, St Andrew's House  
Regent Road, Edinburgh, EH1 3DG  
(by e-mail)

24th April 2025

Dear First Minister

### **Unlock Nature Positive Offshore Wind – refuse Berwick Bank**

We are writing to ask that you act now to unlock nature positive offshore wind. It has become increasingly clear to us that the potential impacts of Berwick Bank are so severe that they overshadow and are undermining the progress of other, lower impact project applications. We therefore urge you to act by:

- Refusing consent for Berwick Bank offshore wind farm; and
- Committing to deliver seabird and wider marine nature resilience and compensation measures commensurate with the scale of offshore wind development being progressed around Scotland.

We support Nature Positive Offshore Wind and strongly believe offshore renewables, if done in the right way and in the right locations, can help address the climate and nature emergency. We welcome your climate action speech of February 19 in which you stated that “*nature should be at the very heart of our climate actions*”. However, it is the shared conviction of our organisations that consenting Berwick Bank - a turbine array covering an area four times the size of Edinburgh and predicted to kill many tens of thousands of seabirds from Scotland's globally important seabird Special Protection Areas (SPAs) - would totally undermine your stated intention. Consequently, our organisations strongly object to the Berwick Bank proposal.

New offshore wind farm applications continue to be submitted and for many of these, frustratingly, RSPB Scotland and others have had no choice but to object, largely due to the predicted in-combination impacts associated with Berwick Bank. Should Berwick Bank be refused, this would immediately remove many of those potential in-combination adverse effects and create a much more conducive context for less damaging projects to progress to consent at pace. For example, the proposed Ossian array is a similar scale to Berwick Bank but is more removed from seabird SPAs and their key foraging areas. As a result, it is predicted to have a much lower impact. However, as noted, at this point, our organisations have been left with no alternative but to raise concerns or object. By refusing Berwick Bank the existing issues become much easier to address.

Ultimately, poorly located and designed proposals pose a major barrier to the delivery of sustainable offshore renewables. A decision to refuse Berwick Bank, alongside a commitment to deliver seabird

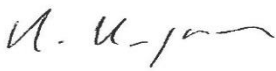
and wider marine nature resilience and compensation measures, would unlock progress and place Scotland in a leading role to deliver nature positive offshore wind alongside its national and global nature responsibilities.

We would welcome your thoughts on our proposal and if it would be helpful to meet, we would be delighted to do so at your convenience.

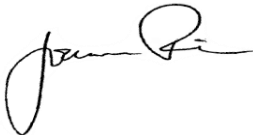
Very best wishes



Anne McCall, RSPB Scotland



Harry Huyton, Scottish Seabird Centre



Jo Pike, Scottish Wildlife Trust



Calum Duncan, Marine Conservation Society



Philip Long, National Trust for Scotland