RWE Renewables UK Onshore Wind Limited

EREDINE WIND FARM FURTHER ENVIRONMENTAL INFORMATION

CONFIDENTIAL - Technical Appendix 6A: Otter Survey Baseline Report 2025

SEPTEMBER 2025

CONFIDENTIAL

RWE Renewables UK Onshore Wind Limited

EREDINE WIND FARM FURTHER ENVIRONMENTAL INFORMATION

CONFIDENTIAL - Technical Appendix 6A: Otter Survey Baseline Report 2025

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

PROJECT NO. UK0041761.4562

DATE: SEPTEMBER 2025

WSP

7 Lochside View
Edinburgh Park
Edinburgh, Midlothian
EH12 9DH

Phone: +44 131 344 2300

WSP.com

QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	First issue			
Date	September 2025			
Prepared by	D Corral			
Signature				
Checked by	J Sneddon			
Signature				
Authorised by	A Miller			
Signature				
Project number	UK0041761.4562			
Report number	V1			
File reference				

CONTENTS

ANNEXES

Introduction

Project Background

WSP UK Ltd (WSP) was commissioned by RWE Renewables UK Onshore Wind Ltd (the Client) to undertake otter surveys at targeted locations at the site of the proposed Eredine Wind Farm. The wind farm site is located approximately 5.5 kilometres (km) north-west of the village of Furnace, and 10km south-west of the town of Inveraray, within Argyll and Bute Council district (central Ordnance Survey [OS] grid reference: NM 98796 04735) hereafter referred to as 'the Development Site' as shown in **Appendix A**, **Figure 6A-1**.

The 'Proposed Development' refers to the Eredine Wind Farm design presented in the November 2024 application to ECU for consent. Following submission of the application and accompanying Environmental Impact Assessment (EIA) Report (2024), consultee responses were received in response to the Section 36 application. A design review was subsequently carried out, resulting in the removal of turbines 3, 5, 7, 11 and 20 and associated infrastructure from the Proposed Development. This amended design iteration is referred to as the 'Revised Development' and is the focus of the Further Environmental Information (FEI) Report which this appendix accompanies.

Otter surveys were carried out in 2020 and 2022 to inform wind farm design and the EIA Report (2024). These surveys were conducted within a 200m buffer surrounding the infrastructure proposed at the time (2020 Survey Area) and identified three confirmed holt (resting site), one confirmed holt/couch (resting site), six confirmed couches, 20 potential holts (resting sites) and 16 potential couches. Otter field signs were found across the 2020 and 2022 Survey Area.

Purpose of the Report

Further otter surveys were undertaken in 2025 in line with best practice guidelines in response to NatureScot's Section 36 submission response:

- *"A number of potential otter holts and couches have been found within the red line boundary of the site. We would advise that the Applicant does further work to confirm their usage, including camera trapping or further field surveys. Given that the location of otter holts and couches can change, we would also advise that a pre-construction survey is carried out 2-3 months prior to construction. Any works within 30m of a confirmed otter shelter or 200m from a confirmed breeding site will require an otter licence. Please note that the latter distance can be reduced to 100m if local circumstances such as dense coverage or topographical screening apply. A Species Protection Plan will also be required. Further information on our licencing process is on our website."*

The purpose of the 2025 baseline otter surveys was to identify further otter resting sites and confirm if potential resting sites within the Development Site (recorded during the 2020 and 2022 surveys) showed signs of otter activity and/or are still present utilising emerging guidance relating to otter survey (Findlay *et al.,* 2023); this information is to be used to inform a mitigation strategy.

Otter Legislation

Otter is classified as a European Protected Species (EPS) listed in the EC Directive (92/43) The Conservation of Natural Habitats and of Wild Flora and Fauna (the “Habitats Directive”), which is transposed into Scottish law through the Conservation (Natural Habitats &c.) Regulations 1994 (the “Habitat Regulations”) as amended. This protection extends to their resting places. Under this legislation it is an offence to deliberately or recklessly:

- Capture, injure or kill an otter;
- Harass an otter or ground of otters;
- Disturb an otter in a holt or any other structure or place it uses for shelter or protection;
- Disturb an otter while it is it rearing or otherwise caring for its young;
- Obstruct access to a holt or other structure or place otters use for shelter or protection, or otherwise deny the animal use of that place;
- Disturb an otter in a manner or in circumstances likely to significantly affect the local distribution or abundance of the species;
- Disturb an otter in a manner or in circumstances likely to impair its ability to survive, breed or reproduce, or rear it otherwise care for its young;
- Damage or destroy a breeding site or resting place of such an animal (whether or not deliberately or recklessly); and
- Keep, transport, sell or exchange, or offer for sale or exchange any wild otter (or any part or derivative of one) obtained after 10 June 1994.

Otter shelters are legally protected whether or not an otter is present. Note that there is no change to the protection of EPS resulting from the UK exit from the EU.

Methods

SURVEY AREA

The '2025 Survey Area' is shown in **Annex A (Figure 6A-1)**.

The Survey Area for 2025 was defined to cover all previously recorded potential otter resting sites to confirm their usage as requested by NatureScot, as well as recording any additional evidence of otter activity. The search covered all watercourses and waterbodies where safe access permitted.

Areas where no otter activity had been recorded during previous surveys were not revisited during the 2025 surveys as these were determined to have low suitability to support otter due to lack of shelter and foraging opportunities.

FIELD SURVEY

The otter survey was undertaken by field surveyors with appropriate qualifications, training and experience of the methods, particularly for renewable energy projects in upland habitats. Otter surveys were undertaken between 29 April – 1 May 2025. The search covered watercourses and waterbodies where safe access permitted as shown in **Annex A: Figure 6A-1**. The entire length of the watercourses within the survey area was walked enabling the surveyors to not only get to previously recorded features but also to identify new features along the way. As turbine 18 is retained for the Revised Development, the distance between construction works for the Revised Development and existing utilities remains unchanged. Therefore, conclusions presented in the EIA Report (2024) remain accurate and **no significant effects** are expected. The survey comprised a search for signs of otters, following NatureScot standing advice (NatureScot, undated) and with reference to emerging guidance' (Findlay *et al*., 2023).

Otter presence can be identified from field signs such as spraints, spraint sites, latrines, paw prints, paths, tail-drag, slides, rolling pitches (flattened areas of grass that otter roll within), food remains, bedding and resting sites. Where evidence was recorded, Target Notes (TNs) and photographs were taken.

Otter resting sites are referred to as **couches** or **holts**. A couch is an uncovered or partially covered above-ground site, which could be within scrub, rushes or grass. A holt is below-ground and completely covered, e.g. within tree root matrix, burrow or rock armour. EU Guidance (European Commission, 2021) states that resting sites need to be protected, even when they are used only occasionally or are abandoned but "*where there is a reasonably high probability that the species concerned will return to these sites and places*". Therefore, the focus of the survey was on finding resting sites that had a probability of current use or a high probability of return, using professional judgement.

To be identified as a **potential resting site**, the feature should have an entrance or 'squeeze hole' of >10 cm diameter, a resting area of >60 cm diameter, and provide some level of shelter[1]. Studies have shown that many resting sites have no obvious signs of use and that otters use many resting sites throughout their territories and do not tend to use the same resting sites for longer than two consecutive days (Green *et al*., 1984). This causes issues surrounding reliable identification of otter resting sites from walkover surveys alone which are well-documented (Findlay *et al*., 2017; and Findlay *et al*., 2023) . A potential resting site is only classified as a **confirmed resting site** where definitive evidence is present, such as described in Findlay *et al* (2023):

- Identification of otter bedding or otter latrine/s within 4m; or
- Camera trapping, whereby a 'rest' is defined as a period of >15 minutes of rest within/on the structure on least one occasion or several short visits over the survey period (using professional judgment).

Where no conclusive evidence of use is obtained through survey or monitoring efforts, but where a feature has suitability to be used for resting purposes, the feature is referred to as a **potential resting site**.

LIMITATIONS

One area proposed for survey near Turbine 12 (see **Appendix A: Figure 6A-1**) was not surveyed due to the waterbody being inaccessible due to windblown and dense un-thinned Sitka spruce plantation.

[1]This is not in published guidance yet, but is expected to be in the new Otter Survey Handbook to be published in Feb 2026, It is based on extensive research conducted by Dr Melanie Findlay, who provided this information on a webinar delivered for Batability dated 23.1.23 https://batability.co.uk/portfolio/otter-field-signs-survey-methods/

Results

Findings have been recorded as TNs in **Appendix B**; their locations are shown on **Figure 6A-2** (**Appendix A**).

The freshwater and terrestrial habitat within the Development Site provides suitable habitat to support foraging and resting otters, with minimal anthropogenic disturbance beyond periods of logging and track resurfacing relating to the forestry works. Otter prey species were observed across the Development Site during the 2025 survey effort, including brown trout *Salmo trutta* within the watercourses and waterbodies, reptiles and amphibians, small rodents (such as field vole *Microtus agrestis*) and ground nesting birds.

The 2025 survey effort confirmed the Survey Area is still in use by otters for foraging, commuting and resting. The following notable findings were recorded:

- One confirmed holt recorded during the 2020 surveys at [redacted] could not be located. The watercourse bank where the holt was recorded in 2020 had suffered from erosion and the bank had collapsed. This holt is therefore no longer present (TN3).
- A single confirmed otter resting site was identified (TN1) on the banks of a small unnamed waterbody, [redacted] This resting site is within a boulder pile, on the north bank of the water body, with an otter latrine present. The resting site was considered shallow and unlikely to be large enough to support more than an individual otter. However, there was clear signs of use by a mammal, due to the paths leading into this feature. Both otter spraint and fox scat were found surrounding this resting site.
- Another confirmed couch was recorded at TN2, [redacted]. It was recorded as a potential couch during the 2020 surveys, however, spraints were recorded within 1m of this feature during the 2025 surveys and so was confirmed as an otter resting site. No further confirmed otter resting sites were identified.

Several spraints and sprainting sites were identified across the 2025 Survey Area (**Figure 6A-2**).

Resting sites and couches identified during the 2020 survey effort that were within the 2025 Survey Area were revisited; however, no other potential resting sites identified as part of the 2020 surveys were confirmed as being actively used by otter as no field signs were recorded at these locations and they remain as potential resting sites. Surveys undertaken in 2020 and 2022 applied a precautionary approach to defining otter resting sites. However, the methodology presented in Section 2.2, provides a stricter rationale in terms of defining the status of otter resting sites, which has resulted in a much-reduced number of defined resting sites

Table 1 summarises the changes that were recorded during the 2025 otter survey compared to the findings in previous surveys carried out in 2020 and 2022.

Table 1 Summary of 2025 Otter Survey Results compared to previous Otter Surveys

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Holt	[redacted]	Root plate of fallen Sitka spruce tree with overhanging moss has created a sheltered alcove stretching back 1-1.5m. This feature extends horizontally for approximately 8m. Evidence of recent mammal activity through lots of prints (too many to define species) and one old otter spraint present inside.	Root plate no longer present; however sheltered alcove present. Not as deep as previously recorded likely due to bank erosion. No evidence of otter within feature or immediately adjacent however spraints present further along water course reclassified as couch (TN2)
Holt	[redacted]	Otter holt under large boulder next to watercourse. Sheltered alcove extends back approximately 1m and an old spraint is present inside.	Not part of the 2025 Survey Area being >200m from works.
Holt	[redacted]	Hole in watercourse bank, approximately 20cm in diameter.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Sheltered alcove under rock next to watercourse. Alcove narrows after 0.75m. No otter field signs observed.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Boulder piles on north side of lochan contain many alcoves and large cavities that would serve as suitable resting places. Otter field signs (spraint) identified at edge of lochan within 20m of boulder piles.	No evidence of otter recorded.
Potential holt	[redacted]	Boulders next to access track contain a cavity with holt potential, measuring approximately 30cm wide and 30cm high. The tunnel extends back at least 1m. No signs of otter activity at entrance however feature would serve as a suitable holt. Feature would benefit from	No evidence of otter recorded.

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
		further monitoring due to proximity to access track.	
Potential holt	[redacted]	Potential holt under tree roots on north-western bank of watercourse. Signs of mammals sliding into the watercourse and walking in mud under tree roots. A possible sprained (fresh and quite green, with otter smell) is present within the feature. May benefit from further monitoring.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Potential holt under tree root plate of fallen Sitka spruce. The leaning root plate creates a sheltered cavity extending back at least 1.5m. Evidence of mammals sheltering inside due to indent in mud, however no definitive otter signs observed.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Hole in bankside with a tunnel measuring approximately 20cm wide and at least 50cm deep (not possible to observe full extent of tunnel). No definitive otter signs observed.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Potential holt in watercourse bank. The tunnel goes back as far as visible.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Potential holt located in watercourse bank. Vegetation has been pushed to one side. The tunnel narrows slightly after 50cm but it is still big enough for an otter.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Potential holt. Tunnels go back as far as visible in the bank. No otter signs present.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	2m long tunnel in the bank, parallel with the watercourse which opens out in two places.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Potential holt	[redacted]	Hole in watercourse bank which goes in as far as visible.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	There is a run from the potential holt approximately 2m from the river to the entrance.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Flattened grass by the river, suggesting possible otter activity. The potential holt is 1m from the watercourse and is undercut into the bank. Hanging moss and grass covers the side, approximately 3m long.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation
Potential holt	[redacted]	Potential holt in bank, with moss and grass covering the sides.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Potential otter holt. Hole goes into the bank as far as can see. Flattened grass leads to the watercourse suggesting use by mammal.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Clear, well used hole into tree stump. Hole goes back as far as is visible. No otter signs.	Tree stump is no longer present.
Potential holt	[redacted]	Potential holt at rocks by a culverted road crossing. Multiple holes in moss covered rock armour.	No evidence of use by otters or field signs nearby of otter.
Potential holt	[redacted]	Hole into the bank as far as is visible.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential holt	[redacted]	Hole in rocks by culverted road crossing.	No evidence of use by otters or field signs nearby of otter.

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Potential holt	[redacted]	Large hole in the bank with potential to be used as a holt.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Couch	[redacted]	Potential couch, approximately 2m long undercut into bank. It is slightly wet, with a cobweb at the entrance.	Feature no longer has any depth; likely affected by bank erosion.
Couch	[redacted]	Potential otter resting site located at a fallen tree covered in moss and grass. There are multiple similar potential resting sites in the surrounding area. No evidence of otter activity was recorded.	No evidence of use by otters or field signs nearby of otter.
Couch	[redacted]	Potential otter resting site. Three large rocks provide cover and there is smoothed grass down to watercourse, indicating mammal activity. No other signs were recorded.	Not part of the 2025 Survey Area being >200m from works.
Couch	[redacted]	Suitable otter resting site under fallen tree. It is located on a steep bank, there are no obvious exit holes by the river. No evidence of otter activity.	Not part of the 2025 Survey Area being >200m from works.
Couch	[redacted]	-[2]	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.

[2] No description provided for 2020 / 2022 surveys

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Target note	[redacted]	In general this watercourse has several natural features with high suitability to serve as otter resting sites, despite a lack of current field signs.	Description remains the same.
Holt/ couch (covered)	[redacted]	Overhanging bank on north-western edge of watercourse creating a sheltered alcove. Two old spraints present on rock inside.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation I.
Couch	[redacted]	Otter couch situated under overhanging bank on south-eastern edge of watercourse. Single, recent, small spraint present on rocks inside.	No evidence of use by otters or field signs nearby of otter.
Couch (covered)	[redacted]	Slanted rock with overhanging heather on north side of watercourse, creating a sheltered space. One fresh spraint inside.	No evidence of use by otters or field signs nearby of otter.
Couch	[redacted]	Sheltered spot next to fallen tree, between root plate and tree roots on north-west bank of watercourse. This feature is positioned approximately 0.5-0.75m above the watercourse. Fresh spraint present on rock inside.	No evidence of use by otters or field signs nearby of otter.
Potential couch (covered)	[redacted]	Sheltered alcove under fallen tree, measuring approximately 0.75m deep. No current field signs.	No evidence of use by otters or field signs nearby of otter.
9Covered couch	[redacted]	Suitable resting site. Located in watercourse bank. Tunnels do not go very far back. Spraint recorded.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential couch	[redacted]	Small area under bank which could provide a couch site for otter.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Potential couch	[redacted]	Potential otter couch in watercourse bank. The hole goes far into the bankside as far as can see.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential couch (covered)	[redacted]	-	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential couch (covered)	[redacted]	-	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential couch (covered)	[redacted]	-	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Couch (covered)	[redacted]	Covered couch approximately 2m long, with flattened grass at the entrance.	No evidence of use by otters or field signs nearby of otter.
Potential couch (covered)	[redacted]	-	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Potential couch (covered)	[redacted]	Potential covered couch in the watercourse bank. Extends for approximately 3m.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.
Couch (covered)	[redacted]	Very large area under cover of a fallen tree's roots, which is now covered in moss. It is approximately 7x3m. A spraint was located.	No evidence of use by otters or field signs nearby of otter.
Potential couch (covered)	[redacted]	Potential covered couch in undercut of bank. Two entrance/exit holes with the middle section covered in moss.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.

Field Sign	Grid Reference	Description (2020 & 2022 Surveys)	2025 Update
Potential couch (covered)	[redacted]	Potential covered couch in watercourse bank, running parallel with water. Approximately 2m long.	No longer present likely lost via bank erosion, tree harvesting or windfall damage from adjacent forestry plantation.

CONCLUSIONS

The 2025 surveys confirmed the following:

- One of the potential resting sites recorded as part of the 2020 surveys was being actively used by otter due to the presence of spraints.
- A further confirmed otter resting site was identified. However, this is >90 m from any proposed works and therefore outside a 30m zone of influence of proposed works. This resting site is considered suitable for supporting one individual otter at a time and is located at the edge of a loch, surrounded by woodland. This area provides good foraging and shelter for otter.

Most of the other potential/confirmed resting sites recorded during the 2020 and 2022 surveys have been lost probably due to bank erosion tree harvesting and/or windfall damage from adjacent forestry plantation.

Those that have not been lost still have the potential to be used; but no evidence of use observed. As a result, it was determined that camera traps would not be necessary.

Due to the lack of evidence of otter use during the 2020, 2022 or 2025 surveys, it is concluded that these features provide potential shelter opportunities for otter. However, the presence of otter spraint throughout the Survey Area demonstrates that they are mobile throughout the Development Site and that use of these potential resting sites in the future cannot be discounted.

It is expected that a Species Protection Plan (SPP) would be a requirement and given that the location of otter holts and couches can change over time, pre-construction surveys would be a requirement 2-3 months prior to construction.

REFERENCES

European Commission (2021). Guidance document on the strict protection of animal species of Community interest under the Habitats Directive: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2021)7301

Findlay, M. A., Briers, R. A., Ingledew, R. P. and White (2023). An evidence-based approach to identifying resting sites of Eurasian otter Lutra lutra from camera-trap and field-sign data. Eur. J. Wildl. Res. 63: 96

Findlay, M. A., Briers, R. A., Diamond, N. and White, P. J. C. (2017). Developing an empirical approach to optimal camera-trap deployment at mammal resting sites: evidence from a longitudinal study of an otter Lutra lutra holt. – Eur. J. Wildl. Res. 63: 96.

Green, J., Green, R. & Jefferies, D.J. (1984). A radio tracking survey of otters on a Perthshire river system. Lutra 27, 85-14

NatureScot (online). Standing advice for planning consultations – Otters. Available: https://www.nature.scot/doc/standing-advice-planning-consultations-otters

Annex A

FIGURES

Annex B

TARGET NOTES

Table 0-1 - Otter survey target notes

TN	Feature	Description	2025 Result	2025 Image	
TN1	Confirmed Resting Site	Resting site beneath boulder on bank of unnamed waterbody with otter latrine (>5 otter spraints within 2m of resting site). Tracks present from water to resting site entrance with the internal cavity not considered suitable to support more than individual otters at each time.	Otter spraints both dry and wet present at nearby latrine as well as mammal path leading to the resting site entrance. Fox scat (including fresh scat) present nearby resting site and latrine.		

TN	Feature	Description	2025 Result	2025 Image
TN2	Confirmed couch	Sheltered undercut banking. No otter field signs observed within banking but otter spraints within 1m of this feature.	Bank erosion since 2020 surveys has removed depth of cover leaving partial cover of undercut banking. Otter spraints found on rocks instream of cover, less than 1m from this point.	
TN3	Holt	Otter holt under large boulder next to watercourse. Sheltered alcove extends back approximately 1m and an old spraint is present inside (2020 Result)	Bank has collapsed probably due to natural erosion, and the holt is no longer present.	No image

7 Lochside View
Edinburgh Park
Edinburgh, Midlothian
EH12 9DH

wsp.com