

Nick Halfhide
NatureScot
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9th October 2025

Dear Nick

Call to designate the Garnock Estuary as a Site of Special Scientific Interest

Congratulations on your appointment as Chief Executive of NatureScot. It is great to see someone with your background and experience at the helm.

In July 2022, we wrote to your predecessor, Francesca Osowska, as a coalition of local groups, wildlife experts, and conservation NGOs, with an urgent request to consider designating the Garnock Estuary in Ayrshire as a Site of Special Scientific Interest (SSSI) for the unique habitats and species it supports¹, which includes:

- An outstanding assemblage of over 1,000 invertebrate species, notably of Coleoptera and Hymenoptera, including 99 species of conservation concern
- Breeding bird assemblages that exceed the SSSI threshold for damp grassland, lowland open waters and margins, lowland fen, and lowland scrub, making it one of the best breeding bird sites on the Lower Clyde coast.
- Populations of 46 flowering plants with a rarity status, including endemic sub-species and those for which Scotland has an international responsibility.
- A unique extensive mosaic of high-quality wildlife habitats which are listed on the Scottish Biodiversity List.

We were encouraged by the response which highlighted that NatureScot considered that *“some parts of the Area, and some of the habitats and species of interest may qualify as SSSI features”* however also note that further information was required to come to a firm conclusion on designation. We have remained in contact with the NatureScot area team, and we appreciate their efforts in continuing to gather evidence in support of the designation over the past three years. However, we are concerned at the potential impact of ongoing delays to designation as a result of challenges in accessing parts of the site for assessment.

We are in full agreement with the Scottish Government and NatureScot that we are living in a nature and climate crisis²³. The State of Nature Scotland Report 2023 shows that since 1994, the abundance of 407 systematically monitored species has declined on average by 15%. While some of these species have seen increases, in the last decade alone 43% have declined, while Natural History Museum and RSPB research shows that Scotland ranks 28th from bottom out of 240 countries in the

¹ <https://cdn.buglife.org.uk/2022/07/Ardeer-SSSI-Letter-July-2022.pdf>

² <https://www.nature.scot/sites/default/files/2022-04/Corporate%20Plan%202022-2026%20-%20A%20nature-rich%20future%20for%20all.pdf>

³ <https://www.transformingplanning.scot/national-planning-framework/draft-npf4/>

Biodiversity Intactness Index⁴⁵. Alarming, one in nine of Scotland's species is threatened with extinction.

We stand by our initial assessment that the designation of the Garnock Estuary presents an excellent opportunity for NatureScot to meet its aspirations to reverse biodiversity loss. It would create an extensive protected area, which would incorporate the diverse habitat mosaic of the Garnock Estuary. It would also help NatureScot to achieve its strategic goal of protecting 30% of Scotland's land for nature by 2030 while presenting an opportunity to ensure the residents of Irvine and Stevenston, South Ayrshire, and beyond can enjoy access to a unique, wildlife-rich and largely untamed space both now and in the future⁶.

The lingering threat of major development proposals remains over parts of the estuary as a result of the archaic Special Development Order issued by the Secretary of State for Scotland in 1953, that leaves the area's special wildlife at risk. This order means that, with few exceptions, there is no need to seek planning permission for any future developments on the extensive Ardeer Peninsula, which sits at the heart of the Garnock Estuary. Any development proposals submitted prior to SSSI designation could lead to losses that cannot be prevented and would jeopardise the important biodiversity of the area, potentially undermining the integrity of any developing SSSI boundary that NatureScot might be considering. It is essential that a boundary is decided urgently and that the challenges in accessing sites do not lead to an overly protracted process that leaves the site vulnerable to destruction.

We are writing to seek assurances that the Garnock Estuary remains a priority for designation as a SSSI and to understand the timeline for progressing the designation.

Yours sincerely

Craig Macadam, Co-Leader and Director of Conservation, Buglife
Bruce Wilson, Head of Policy & Advocacy, Scottish Wildlife Trust
Zoe Clelland, Area Manager- Central Scotland, RSPB Scotland
Alistair Whyte, Head of Plantlife Scotland
David Hill, Interim Head of Nature Recovery Scotland, Butterfly Conservation
Scott Donaldson, Acting Chairman, Butterfly Conservation Glasgow & Scotland Branch

⁴ <https://stateofnature.org.uk/wp-content/uploads/2023/09/TP26056-SoN-Scotland-summary-report-v5-1.pdf>. pagespeed.ce.ElP-TYaoGQ.pdf

⁵ <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>

⁶ <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2020/12/scottish-biodiversity-strategy-post-2020-statement-intent2/documents/scottish-biodiversity-strategy-post-2020-statement-intent/scottish-biodiversity-strategy-post-2020-statement-intent/govscot%3Adocument/scottish-biodiversity-strategy-post-2020-statement-intent.pdf>