

Francesca Osowska
NatureScot
Great Glen House
Leachkin Road
Inverness
IV3 8NW

22nd July 2022

Dear Francesca

Re. Site of Special Scientific Interest Designation of the Garnock Estuary

We are writing on behalf of a coalition of local groups, wildlife experts, and 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 supports.

The Garnock Estuary is a unique mosaic of dunes, grassland, woodlands, scrub and wetlands that has developed as a result of the interaction between the original dune system and the site's complex industrial past. The combination of natural habitats, periodic disturbance and long periods free of management intervention across the site have created a wildlife haven.

The Ardeer Action Group, with the support of wildlife NGOs, has pulled together all available information to summarise the current knowledge of the site.

The attached *Rationale for the SSSI designation of the Garnock Estuary* report clearly demonstrates that the site is of national significance for several biological features, including:

- 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 are in full agreement with the Scottish Government and NatureScot that we are living in a nature and climate crisis^{i & ii}. The State of Nature Scotland Report 2019 shows that from 1994 to 2016, 49% of species have decreased in abundanceⁱⁱⁱ, while Natural History Museum and RSPB research shows that Scotland ranks 28th from bottom out of 240 countries in the Biodiversity Intactness Index^{iv}.

Our proposal presents an excellent opportunity to help NatureScot meet its aspirations to reverse biodiversity loss by creating 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^v 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 future.

We hope that you will see the positive opportunity that protecting the Garnock Estuary presents and recognise that this is in the national interest. In our opinion, the current pressure from built development means the process of designation should begin with urgency.

As a legacy of an archaic Special Development Order issued by the Secretary of State for Scotland in 1953, the area's special wildlife is 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.

Sand extraction across the site has had an ongoing impact on the site's dune habitats and associated wildlife for many years. However, Ardeer has remained largely free of major developments since the 1980s.

Recently, there has been growing development pressure on the Garnock Estuary. The Ardeer Peninsula, in particular, has been proposed as a suitable site for developments including housing, industry, a golf course, wind turbines and a nuclear power plant. As our report shows, a continued development 'free for all' threatens one of Scotland's most important and fascinating nature conservation sites.

We look forward to your response. We would be happy to discuss our report with you and to assist with any further information that you may require.

Yours sincerely

Signed by

Craig Macadam, Conservation Director, Buglife

Anne McCall, Director, RSPB Scotland

Jo Pike, Chief Executive, Scottish Wildlife Trust

Dai Rees, Head of Conservation in Wales, Scotland and Northern Ireland, Butterfly Conservation

Alastair Whyte, Head of Plantlife Scotland

And the following organisations and individuals

Prof Garth Foster, Aquatic Coleoptera Conservation Trust

Dr Alastair Lavery, Scottish Spider Recorder

Lynne Farrell, President of the Botanical Society of Britain and Ireland

Andrew Campbell, Former Operations Manager SNH

Dr Murdo Macdonald, specialist in Scottish Aculeata

Bruce Philp, Coleopterists Society of Britain and Ireland

Paul Cobb, Local entomologist

Prof. Davy McCracken, Professor of Agricultural Ecology, SRUC

Dr Lorna Cole, Wildlife & Conservation Lecturer, SRUC

Dr Geoff Hancock, Hunterian Honorary Research Fellow & Glasgow Natural History Society

Stevenson Community Council

Dr Robert Wolton, Deputy Chair of Dipterists Forum. Former Natural England

Brian Walker, Chair of British Dragonfly Society

Dr Amy Plowman, Head of Conservation and Science, Bumblebee Conservation Trust

Dr Mark Avery, Former UK conservation director RSPB, co-founder and co-director Wild Justice, author and campaigner

Dr Rachael Cooper-Bohannon, Saving Scotland's Amphibians and Reptiles Project Officer, Amphibian and Reptile Conservation

Mags Cousins, Conchological Society of Great Britain and Ireland

Steven Falk, Consultant entomologist, leading bee and fly expert, with first hand knowledge of the Ardeer Peninsula

Anna Haendel, County Butterfly Recorder for Ayrshire

Gill Smart, County Moth Recorder for Ayrshire

Richard Weddle, County Moth Recorder for Lanarkshire

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

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

ⁱⁱⁱ <https://www.nature.scot/doc/state-nature-scotland-report-2019>

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

^v <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>